

November 23, 2015

Tommy Lawson, Manager Stuttgart Municipal Waterworks P.O. Box 130 Stuttgart, AR 72160

RE: City of Stuttgart WWTP Inspection (Arkansas Co) AFIN: 01-00214 NPDES Permit No.: AR0034380 ARR000670

Dear Mr. Lawson:

On November 4, 2015, I conducted a Compliance Evaluation Inspection, a Collection System Inspection, and an Industrial Stormwater 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. Copies of the inspection reports are enclosed for your records.

Please refer to the "Summary of Findings" section of each of the attached inspection reports 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 <u>December 7, 2015</u>.

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

Sincerely,

Steven L. Henderson

Steven L. Henderson District 6 Field Inspector Water Division

Inspection Report: City of Stuttgart WWTP, AFIN: 01-00214, Permit #: AR0034380

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		WATER DIVISION INSPECTION REPORT						
ADLU			AFIN: 01-00214 PERMIT #: AR003438			DATE: 11/4/2015		ATE: 11/4/2015
			OUNTY: 01 Arkansas PDS #:			#: 08781 ′		MEDIA: WN
Dep	A R K A N S A S Department of Environmental Quality GPS LAT: 34.49399			2 LONG: -91.564	096 L	OCATIO	N: En	trance
	FACILITY INFORMAT	ION	1	IN	SPEC	TION INF	ORM	ATION
NAME Cit	y of Stuttgart WWTP			FACILITY TYPE: 1 - Municipal	INSPEC [®]	ror id#: '5 S - Sta	ite	
LOCA 10 ^t	th Street Extension West			FACILITY EVALUATION RATING: INSPECTION TYPE: 3 - Satisfactory Compliance Evaluation				
CITY:				DATE(S): ENTRY TIME: EXIT TIME: PERMIT EFFE				
311	RESPONSIBLE OFFIC			11/4/2015 09:00 11:45 2/1/2015			2/1/2015	
NAME		JAI	-	PERMIT EXPIRATION DATE:				PERMIT EXPIRATION DATE: 1/31/2020
	mmy Lawson, / Water Utilities M	ana	ger	FAYETTEVILLE SHALE RELATED: N				
	PANY: by of Stuttgart							
MAILI	NG ADDRESS:			FAYETTEVILLE				
	D. Box 130 STATE, ZIP:			NAME/TITLE/PHONE/FAX/EMAIL	/ETC.:	FION PAI		
	uttgart, AR 72160			Danny Wilson, I	lead	Nastewa	ter O	perator, Class IV
-	NE & EXT: / FAX: 70) 673- 3246 /							
EMAI	,							
<u> </u>	NTACTED DURING INSPECTION	Va	•					
	INTACTED DORING INSPECTION	Te	S AREA EVA					
		atisfac	tory, M=Marginal, U=Unsati	isfactory, N=Not Applicable/	Evaluated			
S	PERMIT	S	FLOW MEASUR	REMENT	N	STORM		
S U	RECORDS/REPORTS OPERATION & MAINTENANCE	S S			M S			
s	SAMPLING	S EFFLUENT/RECEIVING WATERS SLUDGE HANDLING/DISPOSAL			N			
N	OTHER:	S SLODGE HANDLING/DISPOSAL IN PRETREAT			_/(11)			
			SUMMARY C	OF FINDINGS				
At	the time of inspection, the follow	-						
1. Part III, Section B, 1; inadequate operation and maintenance. Specifically, three clarifiers (one primary,								
one secondary, and one final) were inoperable due to breakdown in equipment.								
GENERAL COMMENTS								
Note: According to facility records for 2015, effluent limits were exceeded five times for Total Suspended								
Solids, four times for Total Residual Chlorine, and one time each for Dissolved Oxygen and Fecal Coliform Bacteria.								
INSPECTOR'S SIGNATURE: Steven L. Henderson Kerri Mª Color								
INS	SPECTOR'S SIGNATURE:) vouceese	Steven L. Henderson				DATE: 11/6/2015	
	L.	م ہ	: MSC.	-				
รม	IPERVISOR'S SIGNATURE:			Kerri McCabe				DATE: 11/20/2015

Inspection Report: City of Stuttgart WWTP, AFIN: 01-00214, Permit #: AR0034380

Inspection Report: City of Stuttgart WWTP, AFIN: 01-00214, Permit #:	AR0034380
SECTION A: PERMIT VERIFICATION	
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS	🗹 S 🗆 M 🗇 U 🗆 NA 🗆 NE
DETAILS:	
1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE:	Øy 🛛 n 🗆 na 🖾 ne
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES:	DY DN ØNA DNE
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:	
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	
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:	
13. HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS:	
14. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT:	
15. IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT:	

SECTION D: SAMPLING						
PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS	ØS OM OU ONA ONE					
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:	Dy Dn Øna Dne					
SECTION E: FLOW MEASUREMENT						
PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS	ØS OM OU ONA ONE					
PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: TYPE OF DEVICE: <u>8' Rect. Weir w/</u> <u>cont.</u>						
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED:						
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED:	Øy 🗆n 🗆na 🗆ne					
4. CALIBRATION FREQUENCY ADEQUATE: Last cal. 1/5/2015						
5. RECORDS MAINTAINED OF CALIBRATION PROCEDURES:	🗹 y 🗆 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	⊠S ⊡M ⊡U ⊡NA ⊡NE					
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:	ØY N NA NE ØY N NA NE					
7. COMMERCIAL LABORATORY USED:						
a. LAB NAME: <u>Arkansas Analytical</u>						
b. LAB ADDRESS: <u>11701 I-30, Bidg. 1, Ste. 115, Little Rock, AR 72209</u>						
c. PARAMETERS PERFORMED: CBOD5, TSS, NH-3N, DO, FCB, TRC, Chronic Bio-Monitoring						
8. BIOMONITORING PROCEDURES ADEQUATE:	ØY In Ina Ine ØY In Ina Ine					
b. PROPER DILUTION SERIES FOLLOWED: c. PROPER TEST METHODS AND DURATION:	ØY IN INA INE ØY IN INA INE					
d. RETESTS AND/OR TRE PERFORMED AS REQUIRED:						

SECTION G: EFFLUENT/RECEIVING WATERS OBSERVATIONS											
BASED ON VISUAL OBSERVATIONS ONLY Image: Constraints DETAILS: Image: Constraints											
OUTFALL #: OIL SHEEN GREASE TURBIDITY VISIBLE FOAM FLOATING SOLIDS COLOR OTHER											
001FALL #.	None				Clear	None					
001	None	None	None None None		None	Clear	NOTE				
SECTION H: SLUDGE DISPOSAL											
SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS											
DETAILS:											
		ΑΤΕ ΤΟ ΜΑΙΝΤΑΙΝ ΕΙ									
	ECORDS MAINTAINED										
	APPLIED SLUDGE, TY				BLIC CONTACT SITE)						
0				,							
SECTION I	SAMPLING IN	SPECTION PR	OCEDURES								
	RESULTS WITH			rs]U ⊠NA ⊡NE				
DETAILS:											
	OBTAINED THIS INSPI	ECTION:				Πr					
2. TYPE OF S			METHOD EREQUE								
	PRESERVED:					ΠY					
4. FLOW PROPORTIONED SAMPLES OBTAINED:											
5. SAMPLE O											
6. SAMPLE R	EPRESENTATIVE OF	OLUME AND NATUR	RE OF DISCHARGE:			ΠY	🗆 n 🗹 na 🗆 ne				
7. SAMPLE S	PLIT WITH PERMITTER	≣:				ΠY	🗆 n 🗹 na 🗆 ne				
8. CHAIN-OF-	CUSTODY PROCEDU		ΠY	□n Øna □ne							
9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT:											
SECTION J	: STORM WAT		NPREVENTION	PLAN							
STORM W	ATER MANAG	EMENT MEE	FS PERMIT RE	QUIREMENTS	5]U ⊠NA ⊡NE				
DETAILS:											
1. SWPPP UF	PDATED AS NEEDED:	_ DATE OF LAST U	PDATE:			Πı					
2. SITE MAP	INCLUDING ALL DISCH	HARGES AND SURFA	CE WATERS:			Πı	🗆n 🗹na 🗆ne				
3. POLLUTIO	N PREVENTION TEAM	IDENTIFIED:				Πı	🗆n 🗹na 🗆ne				
4. POLLUTION PREVENTION TEAM PROPERLY TRAINED:											
5. LIST OF PO	5. LIST OF POTENTIAL POLLUTANT SOURCES:										
6. LIST OF POTENTIAL SOURCES AND PAST SPILLS AND LEAKS:											
7. ALL NON-S	STORM WATER DISCH										
8. LIST OF ST	RUCTURAL BMPS:					ΠY	🗆 n 🗹 na 🗆 ne				
9. LIST OF NO	ON-STRUCTURAL BMF	PS:				ΠY	🗆n 🗹na 🗆ne				
10. BMPS PRC	PERLY OPERATED AN	ND MAINTAINED:				ΠY	□n Øna □ne				
11. INSPECTIO	ONS CONDUCTED AS I	REQUIRED:				ΠY	On Øna One				

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FLOW CALCULATION SHEET

Date: 11/	4/2015 Ti	me: 10:15								
Head in Inches: 2.4 Feet: 0.20										
Type & Size of Primary Flow Measurement Device:										
8' Rectang	ular Weir with end	d contractions								
Name & Mo	odel of Secondary F	Flow Measurement Dev	vice: Greyline SLT 32							
Date of last	Calibration of Sec	ondary Flow Device:	1/5/2015							
Recorded F	Flow at Date & Time	e Listed Above: 1.42	5 MGD (Facility Flow Meter)							
Calaulatad	Flow at Data 9 Tim	a Listad Abaya, 4 F	22							
	Flow at Date & Tim									
(Flow is calculat	ted using flow charts in: 18	CO Open Channel Flow Measu	Irement Handbook-5 Edition)							
	Recorded Value	- Calculated Value								
% Error =		ated Value	- X 100							
	Odicul									
	1.425	- 1.532	X 400							
% Error =		532	- X 100							
a. –	-0.107	X 400								
% Error =	1.532	X 100								
% Error = -0.069 X 100										
% Error =	-6.98	%								
Comments:										

DMR Calculation Check

Reporting Period:	From	2015 Year	08 Month	01 Day	_ To _	2015 Year	08 Month	<u>31</u> Day	
Parameter Checked:		TSS	-						
		Loading				Concer	ntration		
		Mass			Monthly				
	Mo.	Mo. Avg Ibs/day			Mo. Avg mg/l 7-da			ı mg/l	
Reported Value:		77.691			5.71	.71 6.67			
Calculated Value:		77.691			5.71			6.67	
Permit Value:	437.9				15		22.5		

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



CERTIFIED MAIL: 91 7199 9991 7035 3550 9672

January 26, 2016

Tommy Lawson, Manager Stuttgart Municipal Waterworks P.O. Box 130 Stuttgart, AR 72160

Re: Failure to Respond to Inspection (Arkansas Co) AFIN: 01-00214 NPDES Permit No.: AR0034380

Dear Mr. Lawson:

A letter dated November 6, 2015 was sent by the ADEQ to you. The letter outlined the findings of my November 4, 2015 inspection of the above referenced facility. The letter requested that a written response be submitted to the Water Division Inspection Branch of this Department by December 7, 2015. To date, no response has been received.

Please submit a written response by <u>February 9, 2016</u>. A copy of the inspection report has been included for your convenience.

Thank you for your attention to this matter. Should you have any questions, feel free to contact me at (870) 247-5155 or you may e-mail me at <u>henderson@adeq.state.ar.us</u>.

Sincerely,

Storen L. Houderson

Steven L. Henderson District 6 Field Inspector Water Division

Stuttgart Municipal Water Works 612 S College – PO Box 130 – Stuttgart Arkansas 72160 Phone 870-673-3246 Fax 870-673-8783

Tommy Lawson Manager

February 5, 2016

Mr. Steve Henderson Arkansas Dept. of Environmental Quality 5301 Northshore Drive North Little Rock, AR 72118-5317

RE: Failure to Respond Letter AFIN: 01-00214 NPDES Permit No.: AR0034380

Dear Mr. Henderson:

This letter is in response to your letter dated January 26, 2016. The new drive for the primary clarifier has been ordered after approval from City Council. The intermediate clarifier is being pumped out to see what is holding the drive. The final drive unit has parts coming to make necessary repairs. The units will be back in operation as soon as parts arrive. Most of the parts have an 8-10 week delivery from the factory. I apologize for the delay in getting this response to you, and if you have any questions please call me.

Sincerely,

omm

Tommy Lawson Manager

and a second second

[14] A. C. Martin, A. M. Martin, M. M. Martin, M. M. Martin, and M. K. Martin, and M. M. Martin, and M. M. Martin, and M. M



612 SOUTH COLLEGE – P.O. BOX 130 STUTTGART, ARKANSAS 72160-0130

RETURN SERVICE REQUESTED

Hasler FIRST-CLASS MAIL 02/05/2016 USPOSTAGE \$000.48⁵ ZIP 72160

011E10672532

Mr. Steve Henderson Arkansas Dept. of Environmental Quality 5301 Northshore Drive North Little Rock, AR 72118-5317

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72118531799



March 3, 2016

Tommy Lawson, Manager Stuttgart Municipal Water Works P.O. Box 130 Stuttgart, AR 72160

RE: Response to Inspection (Arkansas Co) AFIN: 01-00214 NPDES Permit No.: AR0034380

Dear Mr. Lawson:

I have reviewed the response pertaining to my November 4, 2015 inspection of the wastewater treatment facility. 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.

Please be advised, you should contact me as soon as the repairs are completed so that the corrections can be confirmed.

Thank you for your attention to this matter. Should you have any questions, feel free to contact me at (870) 247-5155 or e-mail at <u>henderson@adeq.state.ar.us</u>.

Sincerely,

Houderson

Steven L. Henderson District 6 Field Inspector Water Division