

December 6, 2017

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

RE: City of Stuttgart Wastewater Treatment Facility Inspections (Arkansas Co)
AFIN: 01-00214 NPDES Permit No.: AR0034380
ARR000670

Dear Mr. Lawson:

On November 7, 2017, I conducted a Compliance Evaluation Inspection, an SSO/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 <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="December 20, 2017">December 20, 2017</a>.

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

Sincerely,

Steven L. Henderson District 6 Field Inspector

Water Division

	WATER DIVISION INSPECTION REPORT								
A R K A N S A S		AFIN: 01-00214 PERMIT #: AR0034380						DATE: <b>11/7/2017</b>	
		CC	DUNTY: 01 Arkan	sas	PDS #	#: <b>10041</b> 7	7	MEDIA: WN	
Dep	partment of Environmental Quality	GF	S LAT: <b>34.49399</b>	2 LONG: -91.5640	096 L	OCATIO	N: Eı	ntrance	
	FACILITY INFORMAT	ION		INS	SPEC1	TION INF	ORN	MATION	
Cit	ः y of Stuttgart WWTP			FACILITY TYPE:  1 - Municipal	2607	or id#: 5 <b>S - Sta</b>	ıtα		
LOCA	ATION:		FACILITY EVALUATION RATING:				ON TYPE:		
10 <sup>th</sup> Street Extension West				2 - Marginal			•	pliance Evaluation	
Stuttgart, AR 72160				1 /	RY TIME:	12:00		PERMIT EFFECTIVE DATE:	
RESPONSIBLE OFFICIAL				,,,	,,,,,			2/1/2015 PERMIT EXPIRATION DATE:	
NAME: / TITLE								1/31/2020	
	mmy Lawson, / Water Utilities Mar	ana	ger	FAYETTEVILLE	SHALI	E RELAT	ED:	N	
	y of Stuttgart			FAYETTEVILLE					
	ING ADDRESS:  D. Box 130							CIPANTS	
CITY,	STATE, ZIP:			NAME/TITLE/PHONE/FAX/EMAIL	/ETC.:				
	uttgart, AR 72160			Danny Wilson, F	iead v	vastewa	ter C	Operator, Class IV	
	0-673- 3246 /								
EMAII									
	uttgartarwater@centurytel.net ONTACTED DURING INSPECTION:	No							
	WITHOUGH BOILING INCI LOTION.	140	AREA EVA	LUATIONS					
			tory, M=Marginal, U=Unsati	sfactory, N=Not Applicable/E					
S	PERMIT	S	FLOW MEASUR	REMENT	N	STORM			
S U	RECORDS/REPORTS OPERATION & MAINTENANCE	S	LABORATORY	CEIVING WATER	M			ITE REVIEW ITORING PROGRAM	
S	SAMPLING	М		LING/DISPOSAL	N	PRETR			
N	OTHER:		020002 ::: " 110	2	1 1				
i i			SUMMARY C						
At	the time of inspection the following	_							
	1. Part III, Section B, 1, A; Inade	-	-		-				
	the intermittent clarifiers (2)			rs (2). All clarifier	s nee	d to be o	clean	ned. Also, the facility	
	has a broken and exposed s	lud	-						
Na	to. The facility evended normit li	i4	GENERAL O		Doois	dual Chi		s in the month of	
	te: The facility exceeded permit li ptember 2017.	mit	s for Ammonia N	itrogen and Total	Resid	auai Chi	orine	e in the month of	
Je	, /								
	Janes Landerson								
INS	INSPECTOR'S SIGNATURE: Steven J. Honderson DATE: 11/13/2017								
	IJ.	~ ~	MSCI						
611	IDEDVICOD'S SICNATURE.	זעו	~ Pt (#40	<b>∢</b> Kerri McCabe				DATE: 42/5/2047	
SU	IPERVISOR'S SIGNATURE:							DATE: <b>12/5/2017</b>	

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:	□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. 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:	⊠y □n □na □ne
g. DATES AND TIMES OF ANALYSES:	⊠y □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:	⊠y □n □na □ne
SECTION C: OPERATIONS AND MAINTENANCE	
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED	□S □M ☑U □NA □NE
DETAILS: Drives on intermittent and final clarifiers are broken.	
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:	☑Y □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 Øn □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 Øn □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

SECTION D: SAMPLING						
PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS	☑S □M □U □NA □NE					
DETAILS:						
SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT:	MY □N □NA □NE					
LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES:	✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓					
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: 8' rectanged end contractions.	ular weir w/  ☑Y □N □NA □NE					
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:	☑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:	ØY □N □NA □NE					
6. SPIKED SAMPLES ARE ANALYZED ≥10% OF THE TIME:	Øy □n □na □ne					
7. COMMERCIAL LABORATORY USED:	☑Y □N □NA □NE					
a. LAB NAME: Arkansas Analytical, Inc.						
b. LAB ADDRESS: 8100 National Drive, Little Rock, AR 72209						
c. PARAMETERS PERFORMED: CBOD5, TSS, NH3-N, DO, pH, FCB, Cu, TP, NO3 + NO2-N, Bio-monitoring						
8. BIOMONITORING PROCEDURES ADEQUATE:	Øy □n □na □ne					
a. PROPER ORGANISMS USED:	ØY □N □NA □NE					
b. PROPER DILUTION SERIES FOLLOWED:	ØY □N □NA □NE					
c. PROPER TEST METHODS AND DURATION:	✓Y □N □NA □NE					
d. RETESTS AND/OR TRE PERFORMED AS REQUIRED:	Øy □n □na □ne					

SECTION G: EFFLUENT/RECEIVING WATERS OBSERVATIONS													
BASED ON	BASED ON VISUAL OBSERVATIONS ONLY												
DETAILS:					<u> </u>								
OUTFALL #:	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	COLOR	OTHER						
001	None	None	None	None	None	Clear	None						
SECTION H	SECTION H: SLUDGE DISPOSAL												
SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS													
DETAILS: Sludge line broken and exposed.													
1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY:													
2. SLUDGE R	ECORDS MAINTAINED	O AS REQUIRED BY 40	O CFR 503:			□ѕ□м	□U ☑NA □NE						
3. FOR LAND	APPLIED SLUDGE, TY	PE OF LAND APPLIE	D TO: (E.G., FOREST,	, AGRICULTURAL, PUI	BLIC CONTACT SITE):								
	SAMPLING IN				T								
	RESULTS WITH	HIN PERMIT R	EQUIREMENT	S			IU ⊠NA □NE						
DETAILS:													
	OBTAINED THIS INSPI					□Y	□N ØNA □NE						
	AMPLE: ☐GRAB:	COMPOSITE: N	METHOD: FREQUE	NCY:									
	PRESERVED:						□N ØNA □NE						
	PORTIONED SAMPLE						□N ☑NA □NE						
	BTAINED FROM FACIL						□N ☑NA □NE						
	EPRESENTATIVE OF \		E OF DISCHARGE:				□N ☑NA □NE						
	PLIT WITH PERMITTER						□N ☑NA □NE						
	CUSTODY PROCEDUI						□N ☑NA □NE						
9. SAMPLES	COLLECTED IN ACCO	RDANCE WITH PERM	IT:			∐Y	□N ☑NA □NE						
OF OTION I	OTODA WAT		DDEVENTION	DI ANI									
	STORM WATE				<u> </u>		III MAIA MAIE						
	ATER MANAG	EMENT MEET	S PERMIT RE	QUIREMENTS	)		IU ⊠NA □NE						
DETAILS:	PDATED AS NEEDED:	DATE OF LAST UP	DATE:			ПУ	□n ☑na □ne						
	INCLUDING ALL DISCH	_											
			DE WATERS.										
	OTENTIAL POLLUTANT		<i>.</i>										
	OTENTIAL POLLUTANI OTENTIAL SOURCES A		DIEAKS:				ON MA ONE						
	STORM WATER DISCH												
	RUCTURAL BMPS:	MINOLO ANE AUTHOR	1144 D.										
	ON-STRUCTURAL BMF	os.					ON MA ONE						
	PERLY OPERATED AT												
	11. INSPECTIONS CONDUCTED AS REQUIRED:												

FLOW CALCULATION SHEET									
Date: 11	/7/2017	Time: <b>10:</b> 0	00						
Head in Ind	Head in Inches: 2.4 Feet: 0.2								
Type & Size of Primary Flow Measurement Device: 8' Rectangular Weir w/ end contractions									
Name & Model of Secondary Flow Measurement Device: Greyline SLT 32									
Date of last Calibration of Secondary Flow Device:   12/10/2016  Recorded Flow at Date & Time Listed Above:   1.500   (Facility Flow Meter)  Calculated Flow at Date & Time Listed Above:   1.532									
	ted using flow charts			.532 asurement	Handbook	:-5 <sup>th</sup> Edition)			
% Error =	Recorded Va	alue - Calc alculated Valu	ulated Val ue	x ·	100				
% Error =	1.500	1.532	1.532	X ^	100				
% Error =	-0.032 1.532	X 100							
% Error =	-0.021	X 100							
% Error = -2.089 %									
Comments: Within +/- 10%									

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

Reporting Period:	From	2017	09	01	_ To	2017	09	30
		Year	Month	Day		Year	Month	Day
Parameter Checked:		NH3-N	_					

	Loading Mass	Concentration Monthly			
	Mo. Avg Ibs/day	Mo. Avg mg/l	7-day Avg mg/l		
Reported Value:	28.192	1.692	*5.267		
Calculated Value:	28.192	1.692	*5.267		
Permit Value:	61.3	2.1	5.2		

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

• Exceeded permit limit

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

Reporting Period:	From	2017	09	01	_ To	2017	09	30	
		Year	Month	Day		Year	Month	Day	
		Total							
		Residual							
Parameter Checked:		Chlorine	_						
		Loading				Concen	tration		
		Mass		Monthly					
	Mo.	Avg Ibs/d	day	Mo. A	vg r	ng/l	7-day Avg	J mg/l	
Reported Value:							*0.0	6	
Calculated Value:							*0.0	6	
Permit Value:			<u> </u>				<0.03	33	

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

• Exceeded permit limit





# Water Division Photographic Evidence Sheet Location: City of Stuttgart WWTP Photographer: Steven L. Henderson Date: 11/7/2017 Time: 10:54 Witness: None Photo #: 5

Description: Intermittent Clarifier #2 (broken drive; needs cleaning).



Photographer:Steven L. HendersonDate:11/7/2017Time:10:57Witness:NonePhoto #:6

Description: Final Clarifier #1 (broken drive; needs cleaning).



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

Water Division Photographic Evidence Sheet									
Location: City of Stuttgart WWTP									
Photographer: Steven L. Henderson Date: 11/7/2017 Time:									
Witness: None Photo #: 7									

Description: Final Clarifier #2 (broken drive).



Photograp	oher:	Steven L. Henderson	Date:	11/7/2017	Time:	10:59
Witness:	None				Photo #	8

Description: Final Effluent



From: <u>Stuttgart Municipal Water</u>
To: <u>Water-Inspection-Report</u>

Subject: Response to Summary of Findings letter

Date: Tuesday, December 19, 2017 3:15:15 PM

Attachments: ADEQ 12-19-17.pdf

Attached is our response to the Summary of Findings for the inspection on November 7, 2017. If there are any questions please call me.

Thanks, Tommy

Stuttgart Municipal Water Works 870-674-7115

### Stuttgart Municipal Water Works

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

> Tommy Lawson Manager

December 19, 2017

Mr. Steven Henderson District 6 Field Inspector Ark. Dept. of Environmental Quality 5301 Northshore Drive North Little Rock, AR 72118-5317

RE: City of Stuttgart Wastewater Treatment Facility Inspections AFIN: 01-00214 NPDES Permit No.: AR0034380 ARR000670

Dear Mr. Henderson:

In response to the Summary of Findings section of your letter dated Dec. 6, 2017 we have the following list of corrective actions:

- 1. Photo #1: The broken sludge line was repaired 12/12/17
- 2. Photo #2: The old bridge for the digester was removed on 12/13/17
- 3. Photo #4: Most of the iron has been cleaned up and we are still in the process of hauling it to the scrap yard.
- 4. Intermittent Clarifiers are being cleaned and put back in service.
- 5. Both drives final clarifiers will be pulled the week of Dec. 18<sup>th</sup> to see what is wrong with them, and put back in service. Weirs will be washed and cleaned.
- 6. The spilled material in Photo #9 will be moved inside and the area cleaned up.

All of the violations are being taken care of as quickly as possible. We will troubleshoot the drive units to see what is wrong with them; The grass and old equipment will be moved out as soon as possible; The old wood forms and pallets are being removed daily.

We will send photos of the completed work in a final report by the end of January 2018. Weather permitting we hope to have all of the violations taken care of by then.

Sincerely,

Jommy Rawson

Tommy Lawson

Manager