

July 3, 2018

Gregory Dell, Chief Operating Officer Conway Corporation P.O. Box 99 Conway, AR 72033

RE: Tupelo Bayou WWTP Inspections (Faulkner Co)

AFIN: 23-01095 NPDES Permit No.: AR0051951

ARR001527

Dear Mr. Dell:

On May 22, 2018, I performed a Compliance Evaluation Inspection, a Pretreatment Compliance Inspection with Industrial User evaluations, an SSO/Collection System Inspection, and an Industrial Stormwater (No-Exposure) 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.

No violations were noted at the time of the inspections. Please refer to each of the attached inspection reports for any comments.

If I can be of any assistance, please contact me at beck@adeq.state.ar.us or (479) 968-7339 extension 16.

Sincerely,

Amy Beck

Hany Bock

District 5 Field Inspector

Office of Water Quality

cc: Trey Lieblong, Conway Corp, Environmental Coordinator, trey.lieblong@conwaycorp.com

WATER DIVISION INSPECTION REPORT AFIN: 23-01095 | PERMIT #: AR0051951 DATE: 5/22/2018 COUNTY: 23 Faulkner PDS #: 103545 MEDIA: WN K A N S A GPS LAT: 35.054659 LONG: -92.534864 LOCATION: Entrance Department of Environmental Quality **FACILITY INFORMATION** INSPECTION INFORMATION FACILITY TYPE: INSPECTOR ID# **Tupelo Bayou WWTP** 1 - Municipal 36537 S - State LOCATION: FACILITY EVALUATION RATING INSPECTION TYPE: 1405 Lollie Road 5 - Satisfactory **Compliance Evaluation** ENTRY TIME: DATE(S): EXIT TIME: PERMIT EFFECTIVE DATE: Conway 5/22/2018 09:30 15:00 1/1/2017 **RESPONSIBLE OFFICIAL** 5/23/2018 09:30 12:00 PERMIT EXPIRATION DATE: NAME: / TITLE 12/31/2021 **Gregory Dell / Chief Operating Officer** FAYETTEVILLE SHALE RELATED: N **Conway Corporation** FAYETTEVILLE SHALE VIOLATIONS: N MAILING ADDRESS P.O. Box 99 **INSPECTION PARTICIPANTS** CITY, STATE, ZIP: Trey Lieblong, Environmental Coordinator, 501-450-Conway AR 72033 6080, trey.lieblong@conwaycorp.com; PHONE & EXT: / FAX: 501-450-6063 / 501-450-6093 Kenny Beaty, Lab Supervisor; greg.dell@conwaycorp.com CONTACTED DURING INSPECTION: No **AREA EVALUATIONS** (S=Satisfactory, M=Marginal, U=Unsatisfactory, N=Not Applicable/Evaluated) **S** PERMIT S FLOW MEASUREMENT S **STORMWATER** RECORDS/REPORTS S **LABORATORY FACILITY SITE REVIEW** S S S **OPERATION & MAINTENANCE** S **EFFLUENT/RECEIVING WATER** S **SELF-MONITORING PROGRAM** S SAMPLING SLUDGE HANDLING/DISPOSAL **PRETREATMENT** OTHER: **SUMMARY OF FINDINGS** At the time of this inspection the facility is in compliance with the permit.

GENERAL COMMENTS

I inspected this facility with Mr. Trey Lieblong on May 22, 2018. Inspection consisted of a facility assessment and records review.

Facility assessment:

The plant remains well-operated, staffed, and maintained. Treatment consists of bar screen, grit removal, two primary clarifiers operated in parallel, aeration basin, two final clarifiers operated in parallel, and UV disinfection. Sludge removed from clarifiers is processed though gravity thickener, primary digester, and secondary digester. All treatment components are functioning as designed. The facility has installed odor control on the primary clarifiers.

No concerns were found with the facility's laboratory. Conway Corp's lab performs BOD5, TSS, pH, DO, and FCB monitoring in-house. Mr. Kenny Beatty informed me they have changed FCB monitoring to the IDEXX method. FCB by the IDEXX method has been approved by the latest Method Update Rule (MUR), which went into effect September 27, 2017.

Record review:

Prior to visiting the facility, I reviewed DMR from April 2016-April 2018. During this period, there were no permit excursions. The facility is testing all parameters at the frequency specified by the permit. I obtained detailed records for April 2018 and verified the data entered for the April DMR were correct. I reviewed the 2018 1st quarter biomonitoring report and found no issue.

- Honz Bock	
INSPECTOR'S SIGNATURE: Amy Beck	DATE: 6/14/2018
Kerri Mª Cale	
SUPERVISOR'S SIGNATURE:Kerri McCabe	DATE: 6/29/2018

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:	☑Y □N □NA □NE
SECTION B: RECORDKEEPING AND REPORTING EVALUATION	
RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT	☑S □M □U □NA □NE
DETAILS:	
ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS:	☑Y □N □NA □NE
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE:	Øs □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:	Øs □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:	
1. TREATMENT UNITS PROPERLY OPERATED:	⊠s □m □u □na □ne
2. TREATMENT UNITS PROPERLY MAINTAINED:	Øs □m □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:	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 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 □N ØNA □NE
14. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT:	OY ØN ONA ONE
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:	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:	•
1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: Yes TYPE OF DEVICE: 6 ft. Parsh	all flume ☑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:	Øy □n □na □ne
7. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE:	Øy □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:	Øy □n □na □ne
SECTION F: LABORATORY	
PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS	ØS □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: American Interplex / Arkansas Analytical	
b. LAB ADDRESS: Little Rock / Little Rock	
c. PARAMETERS PERFORMED: TP, NO3 / WET	
8. BIOMONITORING PROCEDURES ADEQUATE:	☑Y □N □NA □NE
a. PROPER ORGANISMS USED:	☑Y □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:	☑Y □N □NA □NE

	<u> </u>			•	1095, Permit #: AR		
				ATIONS			
ASED ON	N VISUAL OBS	ERVATIONS (ONLY			ØS □M □	U DNA DNE
ETAILS:_	Observations t	<u>aken at Parsha</u>	<u>II flume</u>				
JTFALL #:	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	COLOR	OTHER
001	no	no	no	no	no	clear	
CTION H	: SLUDGE DIS	POSAL					
UDGE D	DISPOSAL MEI	ETS PERMIT F	REQUIREMEN	TS		⊠S □M □	U □NA □NE
ETAILS:							
SLUDGE M	IANAGEMENT ADEQU	ATE TO MAINTAIN EF	FLUENT QUALITY:			⊠s □m	□U □NA □NE
SLUDGE R	ECORDS MAINTAINE	O AS REQUIRED BY 4	0 CFR 503:			⊠s □m	□U □NA □NE
FOR LAND	APPLIED SLUDGE, T	YPE OF LAND APPLIE	D TO: (E.G., FOREST	, AGRICULTURAL, PUI	BLIC CONTACT SITE): Pa	asture_	
CTION I:	SAMPLING IN	SPECTION PRO	OCEDURES				
AMPLE R	RESULTS WITH	HIN PERMIT R	EQUIREMENT	S			U ⊠NA □NE
ETAILS:							
SAMPLES	OBTAINED THIS INSP	ECTION:				□Y	□n ☑na □ne
TYPE OF S	SAMPLE: GRAB:	□COMPOSITE: I	METHOD: FREQUE	ENCY:			
SAMPLES	PRESERVED:					□Y	□N ☑NA □NE
FLOW PRO	PORTIONED SAMPLE	S OBTAINED:				□Y	□n ☑na □ne
SAMPLE O	BTAINED FROM FACI	LITY'S SAMPLING DE'	VICE:			□Y	□n ☑na □ne
SAMPLE R	EPRESENTATIVE OF	VOLUME AND NATUR	E OF DISCHARGE:			□Y	□n ☑na □ne
SAMPLE S	PLIT WITH PERMITTE	E:				□Y	□n ☑na □ne
CHAIN-OF-	CUSTODY PROCEDU	RES EMPLOYED:				□Y	□N ☑NA □NE
SAMPLES	COLLECTED IN ACCO	RDANCE WITH PERM	IIT:			□Y	□n ☑na □ne
CTION J	: STORM WAT	ER POLLUTION	PREVENTION	PLAN			
TORM W	ATER MANAG	EMENT MEET	S PERMIT RE	QUIREMENTS	3		U ⊠NA □NE
ETAILS:							
SWPPP UP	PDATED AS NEEDED:	_ DATE OF LAST UP	PDATE:			□Y	□N ☑NA □NE
SITE MAP I	INCLUDING ALL DISC	HARGES AND SURFA	CE WATERS:			□Y	□N ☑NA □NE
POLLUTIO	N PREVENTION TEAM	I IDENTIFIED:				□Y	□N ☑NA □NE
POLLUTIO	N PREVENTION TEAM	PROPERLY TRAINE	D:			□Y	□N ☑NA □NE
LIST OF PO	OTENTIAL POLLUTAN	T SOURCES:				□Y	□N ☑NA □NE
LIST OF PO	OTENTIAL SOURCES /	AND PAST SPILLS AN	D LEAKS:			□Y	□n ☑na □ne
ALL NON-S	STORM WATER DISCH	IARGES ARE AUTHOR	RIZED:			□Y	□n ☑na □ne
LIST OF ST	RUCTURAL BMPS:					□Y	□n ☑na □ne
LIST OF NO	ON-STRUCTURAL BMF	PS:				□Y	□n Øna □ne
BMPS PRC	PERLY OPERATED A	ND MAINTAINED:					□N ☑NA □NE
INSPECTIO	ONS CONDUCTED AS	REQUIRED:				□Y	□N ☑NA □NE
	ECTION I: SLUDGE R FOR LAND ECTION I: SLUDGE R FOR LAND ECTION I: AMPLE R ETAILS: SAMPLES: SAMPLES: SAMPLES: SAMPLES: SAMPLES: SAMPLES: FLOW PRO SAMPLE S CHAIN-OF- SAMPLES: SAMPLES:	ECTION G: EFFLUENT/R ASED ON VISUAL OBSETAILS: Observations to the control of the	ASED ON VISUAL OBSERVATIONS OF TAILS: Observations taken at Parsha UTFALL#: OIL SHEEN GREASE OO1 NO	ECTION G: EFFLUENT/RECEIVING WATERS OBSERVASED ON VISUAL OBSERVATIONS ONLY TAILS: Observations taken at Parshall flume UTFALL #: OIL SHEEN GREASE TURBIDITY 001	ECTION G: EFFLUENT/RECEIVING WATERS OBSERVATIONS ASED ON VISUAL OBSERVATIONS ONLY ETAILS: Observations taken at Parshall flume UTFALL #: OIL SHEEN GREASE TURBIDITY VISIBLE FOAM 001 no	ECTION G: EFFLUENT/RECEINING WATERS OBSERVATIONS ASED ON VISUAL OBSERVATIONS ONLY ETAILS: Observations taken at Parshall flume UTFALL #: OIL SHEEN GREASE TURBIDITY VISIBLE FOAM FLOATING SOLIDS 001	ECTION G: EFFLUENT/RECEIVING WATERS OBSERVATIONS ASED ON VISUAL OBSERVATIONS ONLY ETAILS: Observations taken at Parshall flume UTFALL #: OIL SHEEN

		FLOW CALCULATION	SHEET	
Date: 5/2	2/18	Time: 11:15		
Head in Inc	hes:	Feet: 0.34		
Type & Size	e of Primary Flow	Measurement Device: 6	6 foot Parshall flume	
71	,			
Name & Mo	odel of Secondary	Flow Measurement Dev	evice: HydroRanger	
Date of last	Calibration of Se	condary Flow Device:	5/21/18	
Recorded F	Flow at Date & Tin	ne Listed Above: 2.828	8 (Facility Flow Meter)	
		me Listed Above: 2.77		
(Flow is calculat	ted using flow charts in:	ISCO Open Channel Flow Measu	urement Handbook-5" Edition)	
% Error =	Recorded Value Calc	e - Calculated Value ulated Value	X 100	
% Error =	2.828	- 2.775 2.775	X 100	
		2.113		
% Error =	0.053	X 100		
	2.775			
% Error =	0.019	X 100		
% Error =	1.9	%		
	<u> </u>			
Comments:				

DMR Calculation Check

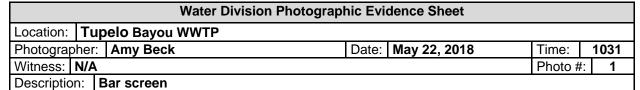
Reporting Period:	From	<u> 2018 </u>	04	01	_ To __	2018	04	30
		Year	Month	Day		Year	Month	Day
Parameter Checked:		Flow	_					
		Loading Mass				Concer Mon	ntration thly	
	Mo.	Avg Ibs/	day	Mo. A	vg r		7-day Avg	J mg/l
Reported Value:	N/A			6.182		16.797		
Calculated Value:	. N/A		6.182			16.797		
Permit Value: N/A		Repe	ort, Mo	GD	Report, (Daily Max			

If calculated value does not equal reported value, explain:

DMR Calculation Check

Reporting Period:	From	2018	04	01	_ To	2018	04	30
		Year	Month	Day		Year	Month	Day
Parameter Checked:		BOD5	_					
		Loading				Concer	ntration	
		Mass				Mon	thly	
	Mo.	Avg Ibs/	day	Mo. A	vg ı	mg/l	7-day Avg	g mg/l
Reported Value:		289.3			6.1		7.9)
Calculated Value:		298.3			6.1		7.9)
Permit Value:		4,000			30.0		45.	0

If calculated value does not equal reported value, explain:





 Photographer:
 Amy Beck
 Date:
 May 22, 2018
 Time:
 1033

 Witness:
 N/A
 Photo #:
 2





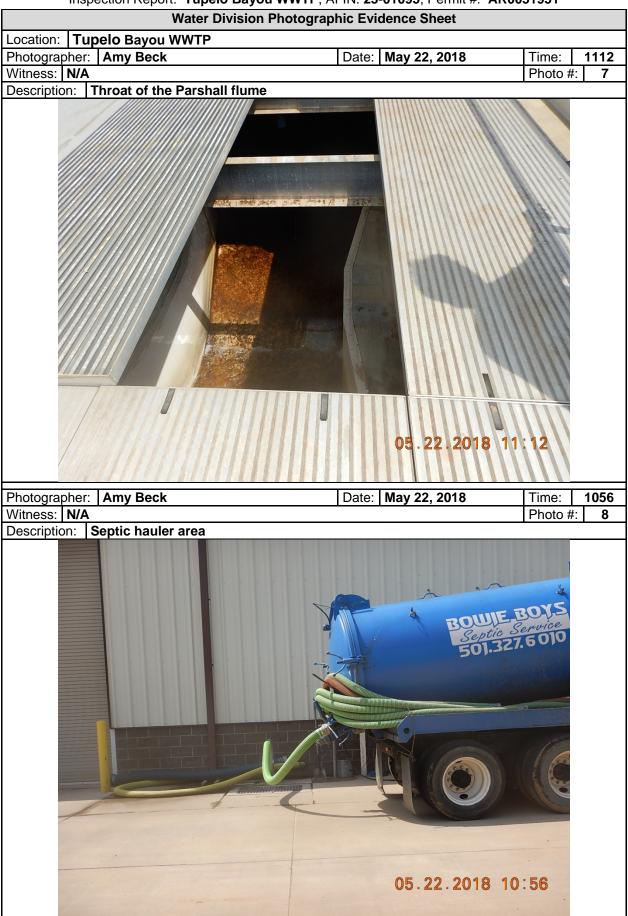
Water Division Photographic Evidence Sheet Location: Tupelo Bayou WWTP Photographer: Amy Beck Date: May 22, 2018 Time: 1038 Witness: N/A Photo #: 3 Description: Primary clarifiers have been covered for odor control.



Photographer:Amy BeckDate:May 22, 2018Time:1053Witness:N/APhoto #:4







Inspection Report: Tupelo Bayou WWTP, AFIN: 23-01095, Permit #: AR0051951

Water Division Photographic Evidence Sheet							
Location:	Tup	elo Bayou WWTF	P				
Photograp	her:	Amy Beck		Date:	May 22, 2018	Time:	1057
Witness: I	N/A					Photo #:	9

Description: Sludge gravity thickener



Photographer: Amy Beck	Date: May 22, 2018 T	ime:	1055
Witness: N/A	P	hoto #:	10

Description: Sludge digester from outside



Water Division Photographic Evidence Sheet Location: Tupelo Bayou WWTP Photographer: Amy Beck Date: May 22, 2018 Time: 1047 Witness: N/A Photo #: 11

Description: Temperature monitoring on sludge digestion



Photographer:Amy BeckDate:May 22, 2018Time:1045Witness:N/APhoto #:12

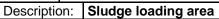




Figure 1. Google Earth image dated March 2017 with facility entrance and outfall location noted.

Pourlas In

Tupelo Bayou WWTP

Google earth

La 2016 Coogle

Coogle earth

Figure 2. Google Earth image dated March 2017 with facility treatment components noted.

Screening and Grit removal

Primary Clarifiers

Studge Digester

Aeration Basins Studge Gravity Thickener

Secondary Clarifiers

Google earth