

November 26, 2018

Dickie Kennemore, Mayor City of Osceola P.O. Box 443 Osceola, AR 72370

RE: Osceola WWTP Inspection AFIN: 47-00956 Permit No.: AR0021580

Dear Mayor Kennemore:

On August 28, 2018, I performed a Compliance Evaluation Inspection, SSO/Collection System Inspection, and 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. A copy of the inspection reports are 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 10, 2018**.

If I can be of any assistance, please contact me at 870-935-7221 ext/-15 or frasher@adeq.state.ar.us.

Sincerely,

Sarah Frasher District 3 Field Inspector Water Division

Inspection Report: Osceola WWTP, AFIN: 47-00956, Permit #: AR0021580

	ADEO	WATER DIVISION INSPECTION REPORT						
	ADLU	AFIN: 47-00956 PERM		ERMIT #: AR00215	80		DATE: 8/28/2018	
Α	R K A N S A S	СС	DUNTY: 47 Missis	ssippi F	DS #	#: 105544	MEDIA: WN	
Der	partment of Environmental Quality	GF	PS LAT: 35.679585 LONG: -90.038580 LOCATION: Entrance					
NAME	FACILITY INFORMAT	ION	1				ORMATION	
Os	e: sceola WWTP			FACILITY TYPE:       INSPECTOR ID#:         1 - Municipal       112347 S - State         FACILITY EVALUATION RATING:       INSPECTION TYPE:				
~ <b>1.</b>	.27 miles W. Keiser Avenue			FACILITY EVALUATION RATING:     INSPECTION TYPE:       2 - Marginal     Compliance Evaluation				
	sceola			DATE(S): ENTRY TIME: EXIT TIME: PERMIT EFFECTIVE DATE: 8/28/2018 11:00 15:03 10/1/2016				
	RESPONSIBLE OFFIC	SIAL	-	8/28/2018 11:00 13:03 10/1/2016 PERMIT EXPIRATION DATE: 9/30/2021				
COMF	ckie Kennemore / Mayor			FAYETTEVILLE S	HAL	E RELATE	D: <b>N</b>	
	ty of Osceola			FAYETTEVILLE S	HAL		IONS: N	
P.C	O. Box 443						TICIPANTS	
CITY, STATE, ZIP: Osceola AR 72370 PHONE & EXT: / FAX: / EMAIL:				NAME/TITLE/PHONE/FAX/EMAIL/ETC.: Brandon Haynes/ Water & Wastewater Superintendent/ 870-563-2628				
CC	ONTACTED DURING INSPECTION:	: No	!					
		-	AREA EVA	LUATIONS				
S	(s=sa PERMIT	atisfac S	ctory, M=Marginal, U=Unsati	isfactory, N=Not Applicable/Ev	aluated	) STORMV		
S	RECORDS/REPORTS	S	LABORATORY		S		Y SITE REVIEW	
Μ	<b>OPERATION &amp; MAINTENANCE</b>	S					F-MONITORING PROGRAM	
S	SAMPLING	S	SLUDGE HAND	LING/DISPOSAL	Ν	PRETRE	ATMENT	
Ν	OTHER:	_		OF FINDINGS				
_			SUIVIIVIARTO	JF FINDINGS				
<ul> <li>The following violations were noted at the time of the inspection:         <ol> <li>High vegetation was observed around the lagoon levees (Photos 2-5) in violation of Part III, Section B.1.a of the permit. Well maintained levees (short grass without weeds and brush) discourage burrowing animals such as groundhogs and muskrats from establishing a presence, allow for better airflow and thus improved oxygen exchange across the lagoons, and allow for easy visual inspection of the levee so that problem areas can be readily addressed. Low-growing, perennial, spreading grasses that are easily mowed and maintained are preferred. Trees and other woody vegetation possess extensive root systems that can infiltrate wastewater lagoon levees resulting in leaks/seeps that could weaken levees to such a degree that a complete failure occurs.</li> </ol></li></ul> <li>The facility reported an Average Monthly Flow of 2.087 MGD instead of 0.202 MGD. This was due to the facility not calculating the Monthly Average Flow with the zero measurements included. Any measurements taken including zero measurements should be included in the calculation for the Monthly Average.</li>								
<u> </u>	GENERAL COMMENTS							
A٤	SSO/Collection System Inspectior	n ar	d Industrial Stor	mwater Inspection	wer	e perform	ed in conjunction with	

this inspection. Please view attached letter for further details.

C/ ful		
INSPECTOR'S SIGNATURE:	DATE: 11/15/2018	
SUPERVISOR'S SIGNATURE: Jason Bolenbaugh	DATE: <b>11/19/2018</b>	

Inspection Report: Osceola WWTP, AFIN: 47-00956, Permit #: AR0021580

Inspection Report: Osceola WWTP, AFIN: 47-00956, Permit #: AR	0021580
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS	
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	
DETAILS:	
ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS:	
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE:	
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:	Øy 🛛 n 🖾 na 🖾 ne
f. RESULTS OF ANALYSES:	Øy 🗆n 🗆na 🗇ne
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:	🗹 s 🗆 m 🗇 u 🗆 na 🗇 ne
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: High vegetation at lagoon levees.	OS 🗹 M OU ONA ONE
2. TREATMENT UNITS PROPERLY MAINTAINED:	
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED:	
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE:	Øs 🗆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:	
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						
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:	Øy 🗆n 🗆na 🗇ne						
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT:	Øy 🗆n 🗆na 🗇ne						
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: <u>Yes</u> TYPE OF DEVICE: <u>Multifunction</u> Ultrasonic Flowmeter							
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED:							
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED:							
4. CALIBRATION FREQUENCY ADEQUATE:	Dy On Øna One						
5. RECORDS MAINTAINED OF CALIBRATION PROCEDURES:	DY DN ØNA DNE						
6. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE:	DY DN ØNA DNE						
7. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE:	Øy On Ona One						
8. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES:	Øy On Ona One						
9. HEAD MEASURED AT PROPER LOCATION:	Øy On Ona One						
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) :	🗹 y 🗆 n 🗆 na 🗆 ne						
2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED:							
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 <u>&gt;</u> 10% OF THE TIME:	Øy 🛛 n 🖓 na 🖓 ne						
6. SPIKED SAMPLES ARE ANALYZED <u>&gt;10%</u> OF THE TIME:	🗹 y 🗆 n 🗆 na 🗆 ne						
7. COMMERCIAL LABORATORY USED:							
a. LAB NAME: <u>Waypoint Analytical</u>							
b. LAB ADDRESS: <u>Memphis, TN</u>							
c. PARAMETERS PERFORMED: WET							
8. BIOMONITORING PROCEDURES ADEQUATE:							
a. PROPER ORGANISMS USED:							
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						

## Inspection Report: Osceola WWTP, AFIN: 47-00956, Permit #: AR0021580

SECTION G: EFFLUENT/RECEIVING WATERS OBSERVATIONS									
BASED ON	VISUAL OBS	ERVATIONS C	DNLY			ØS OM O			
DETAILS: No Discharge									
OUTFALL #: OIL SHEEN GREASE TURBIDITY VISIBLE FOAM FLOATING SOLIDS COLOR OTHER									
001	N/A	N/A	N/A	N/A	N/A	N/A			
SECTION H	: SLUDGE DIS	POSAL							
SLUDGE D	DISPOSAL ME	ETS PERMIT F	REQUIREMEN	TS			IU ⊠NA ⊡NE		
DETAILS:	Sludge stays in	<u>n lagoon.</u>							
1. SLUDGE M	ANAGEMENT ADEQU	ATE TO MAINTAIN EF	FLUENT QUALITY:			⊡s ⊡m	DU 🕅 NA DNE		
2. SLUDGE R	ECORDS MAINTAINED	D AS REQUIRED BY 40	) CFR 503:			⊡s ⊡m	DU 🖾NA DNE		
3. FOR LAND	APPLIED SLUDGE, TY	PE OF LAND APPLIE	D TO: (E.G., FOREST,	AGRICULTURAL, PUE	BLIC CONTACT SITE):				
		SPECTION PRO							
SAMPLE R	ESULTS WITH	HIN PERMIT R	EQUIREMENT	S			U ØNA ⊡NE		
DETAILS:									
1. SAMPLES	OBTAINED THIS INSPI	ECTION:				ΠY	🗆 n 🗹 na 🗆 ne		
2. TYPE OF S	AMPLE: GRAB:		IETHOD: FREQUE	NCY:					
3. SAMPLES	3. SAMPLES PRESERVED:								
4. FLOW PRC	4. FLOW PROPORTIONED SAMPLES OBTAINED:								
5. SAMPLE O	5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE:								
6. SAMPLE R	EPRESENTATIVE OF	VOLUME AND NATUR	E OF DISCHARGE:			ΠY	On Øna One		
7. SAMPLE SI	PLIT WITH PERMITTEI	E:				ΠY	⊡n Øna ⊡ne		
8. CHAIN-OF-	CUSTODY PROCEDU	RES EMPLOYED:				ΠY	□n Øna □ne		
9. SAMPLES	9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT:								
SECTION J	: STORM WAT	ER POLLUTION	PREVENTION	PLAN					
STORM W	ATER MANAG	EMENT MEET	S PERMIT RE	QUIREMENTS			IU ⊠NA ⊡NE		
DETAILS:	See Industrial S	Stormwater Insp	<u>pection.</u>						
1. SWPPP UP	DATED AS NEEDED:	DATE OF LAST UP	DATE:			ΠY	⊡n Øna ⊡ne		
2. SITE MAP I	NCLUDING ALL DISCH	HARGES AND SURFAC	CE WATERS:			ΠY	On Øna One		
3. POLLUTIO	POLLUTION PREVENTION TEAM IDENTIFIED:								
4. POLLUTION	4. POLLUTION PREVENTION TEAM PROPERLY TRAINED:       Image: Constraint of the second sec								
5. LIST OF PC									
6. LIST OF PC	B. LIST OF POTENTIAL SOURCES AND PAST SPILLS AND LEAKS:       Im Im Im Image: Comparison of the second								
7. ALL NON-STORM WATER DISCHARGES ARE AUTHORIZED:     Image: Comparison of the second se									
8. LIST OF STRUCTURAL BMPS:									
9. LIST OF NO	9. LIST OF NON-STRUCTURAL BMPS:								
10. BMPS PRO									
11. INSPECTIC	NS CONDUCTED AS	REQUIRED:				ΠY	ON ØNA ONE		
1									

## **DMR Calculation Check**

Reporting Period:	From	2018 Year	03 Month	01 Day	_ To _	2018 Year	03 Month	<u>31</u> Day		
Parameter Checked:		BOD	-							
		Loading Mass			Concentration Monthly					
	Mo.	Avg Ibs/c	lay	Mo. A	vg r		7-day Avg	mg/l		
Reported Value:		132			5.64		18.3			
Calculated Value:		132			5.64		18.3			
Permit Value:	625.5			30			45			

If calculated value does not equal reported value, explain: Equal

## **DMR Calculation Check**

Reporting Period:	From	2017 Year	07 Month	01 Day	_ То	2017 Year	07 Month	31 Day
Parameter Checked:		Flow						
		Loading Mass				Monthl	y Flow	
	Mo.	Avg Ibs/c	lay	Mo. A	vg I	MGD	Daily Max	MGD
Reported Value:		N/A			2.087		1.230	
Calculated Value:	N/A			0.202			1.230	
Permit Value:		N/A		R	eport		Repo	ort

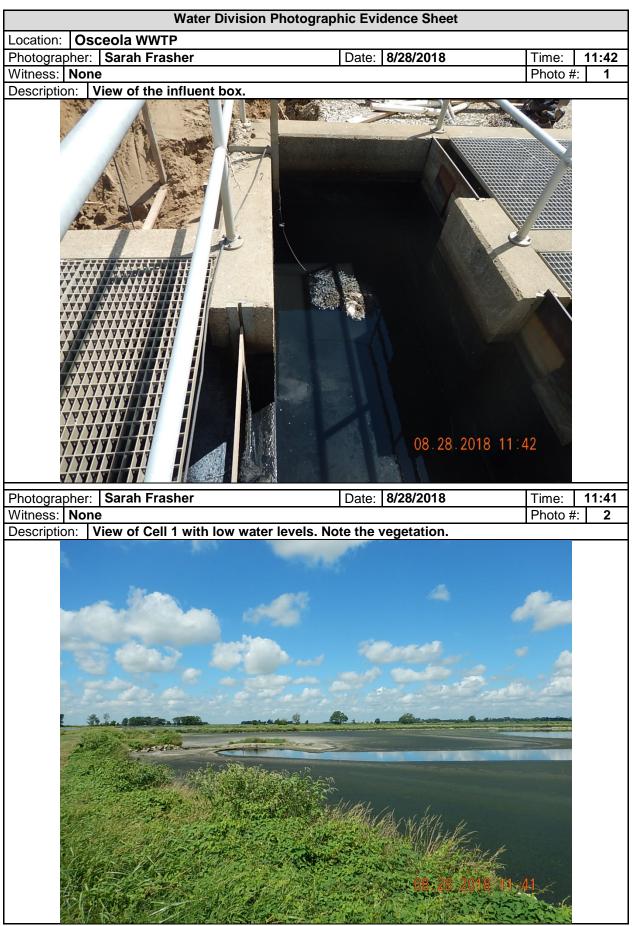
Facility not including zero measurements with Monthly Average.

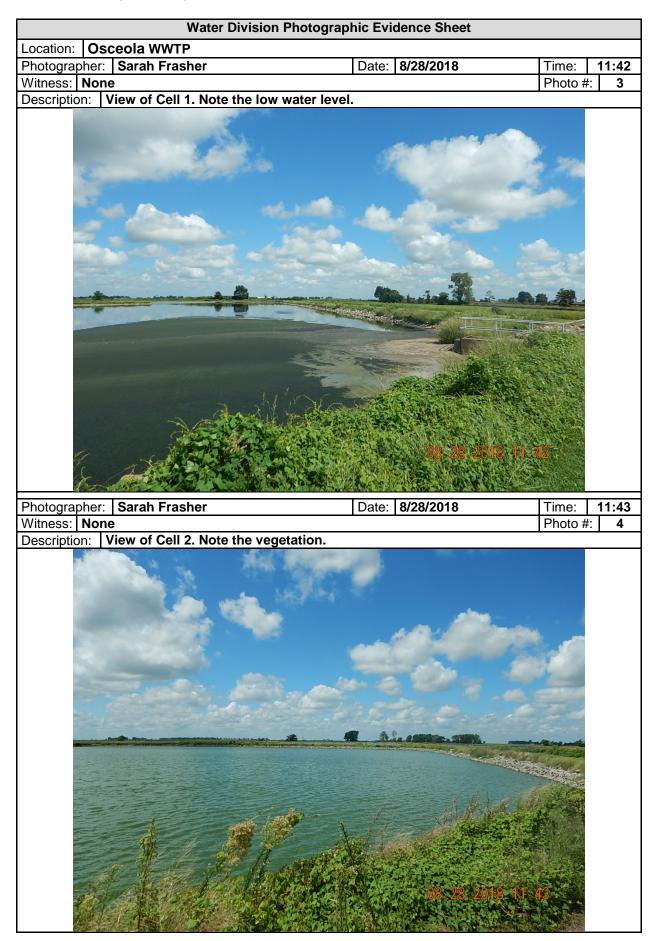
If calculated value does not equal reported value, explain:

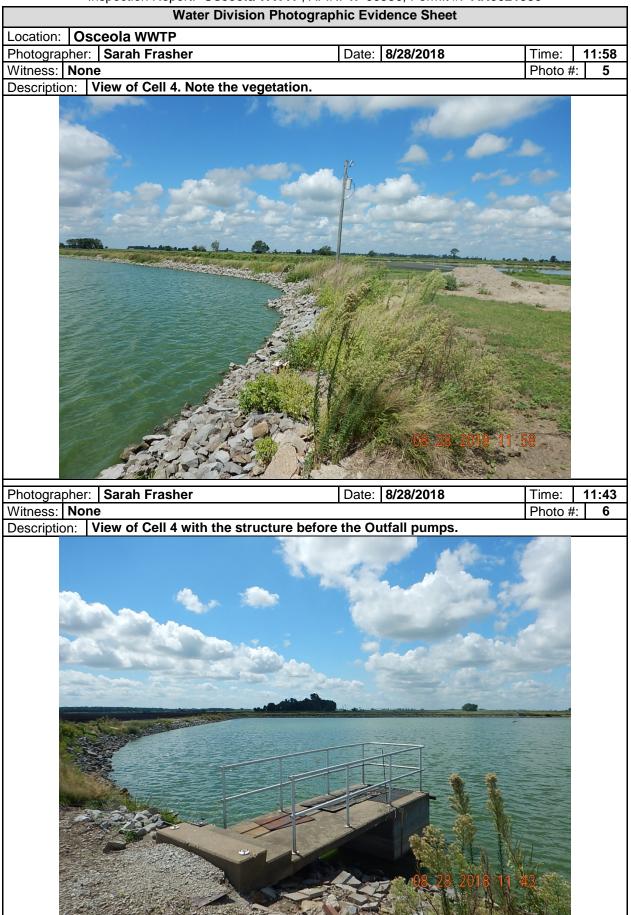
Inspection Report: Osceola WWTP, AFIN: 47-00956, Permit #: AR0021580

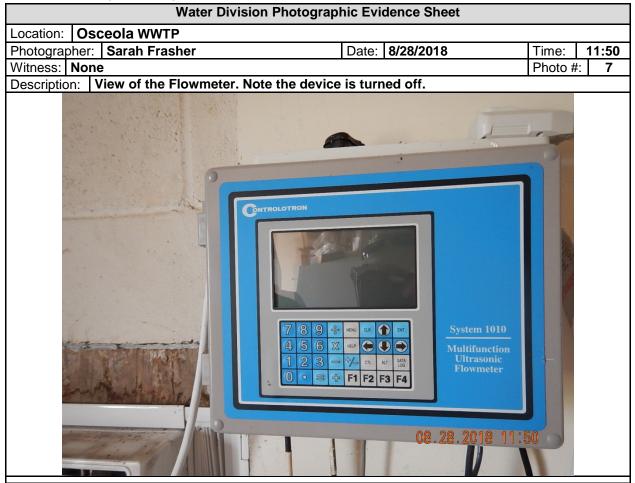


Figure 1. Google Earth image of the Osceola WWTP with labels for the different portions of treatment. Note the square area identifying the construction site for the additional cells.









From:	Frasher, Sarah
To:	Water-Inspection-Report
Subject:	FW: Response letter for Osceola
Date:	Tuesday, May 28, 2019 10:41:45 AM
Attachments:	Response for violations observed during inspection.docx

Please attach the following to the City of Osceola Inspection Response, AR0021580, with WID #105544. Thank you.

## Sarah Frasher

District 3 Field Inspector Water Division - Jonesboro Field Office Arkansas Department of Environmental Quality 870-935-7221 ext.-15 <u>frasher@adeq.state.ar.us</u>

From: Brandon Haynes [mailto:bhaynes58@yahoo.com]
Sent: Friday, May 24, 2019 1:05 PM
To: Frasher, Sarah; 'Brandon Haynes'
Subject: Response letter for Osceola

Sarah,

I've attached the response letter for the violations during the Compliance Evaluation Inspection. If you need anything else from, just let me know.

Thanks, Brandon Haynes Osceola W/WWT Supt. Cell: 870-815-9691 Cell: 870-549-1807 Office: 870-563-2628 Fax: 870-549-0501 Email: bhaynes58@yahoo.com Response for violations observed during inspection.

Violations include:

<u>1<sup>st</sup>: High vegetation growth around the cells at lagoon.</u>

**Action:** At the time of inspection chemicals used was not available and therefore unable to spray. Vegetation has since been sprayed and taken care of, and extra purchased to ensure of non-reoccurrence.

2<sup>nd</sup>: Calculating monthly average flow.

**Action:** Monthly flow is now calculated with the zero discharge flow added along with normal flow days for the month.

<u>3<sup>rd</sup>: Cheryl Street Pump Station light bulb for visual light was blown.</u>

Action: Bulb has been replaced.

Thanks,

**Brandon Haynes** 

Osceola Water/Wastewater Superintendent



June 11, 2019

Dickie Kennemore, Mayor City of Osceola P.O. Box 443 Osceola, AR 72370

RE: City of Osceola Inspection Response Permit No.: AR0021580 AFIN: 47-00956

Dear Mayor Kennemore:

I have reviewed the response pertaining to my August 28, 2018 inspection of the City of Osceola. 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.

If we need further information concerning this matter, we will contact you. Thank you for your attention to this matter. Should you have any questions, feel free to contact me at 870-935-7221 ext.-15 or you may e-mail me at <u>frasher@adeq.state.ar.us</u>.

Sincerely,

Sarah Frasher District 3 Field Inspector Water Division