

ADEQ

A R K A N S A S
Department of Environmental Quality

February 25, 2020

Tim McKinney, Mayor
City of Berryville
P.O. Box 227
Berryville, AR 72616

RE: City of Berryville WWTP Inspection
AFIN: 08-00034 Permit No.: AR0021792

Dear Mayor McKinney:

On November 5, 2019, I performed a Compliance Evaluation 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 response should be mailed to the attention of the Office of Water Quality Compliance Branch at the address at the bottom of this letter or e-mailed to Water-Inspection-Report@adeq.state.ar.us. 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 **March 11, 2020**.

If I can be of any assistance, please contact me at grimesg@adeq.state.ar.us or 479-267-0811 ext. 16.

Sincerely,



INSPECTOR NAME
District 1 Field Inspector
Office of Water Quality



A R K A N S A S
Department of Environmental Quality

OFFICE OF WATER QUALITY INSPECTION REPORT

AFIN: 08-00034	PERMIT #: AR0021792	DATE: 11/5/2019
COUNTY: 08 Carroll	PDS #: 111132	MEDIA: WN
GPS LAT: 36.357209 LONG: -93.578754 LOCATION: Entrance		

FACILITY INFORMATION

NAME:
City of Berryville WWTP

LOCATION:
1000 West Cedarvale Road

CITY:
Berryville, AR

INSPECTION INFORMATION

FACILITY TYPE: 1 - Municipal	INSPECTOR ID#: 104111 S - State		
FACILITY EVALUATION RATING: 4 - Satisfactory	INSPECTION TYPE: Compliance Evaluation		
DATE(S): 11/5/2019	ENTRY TIME: 10:56	EXIT TIME: 14:07	PERMIT EFFECTIVE DATE: 11/1/2016
			PERMIT EXPIRATION DATE: 10/31/2021

RESPONSIBLE OFFICIAL

NAME: / TITLE
Tim McKinney / Mayor

COMPANY:
City of Berryville

MAILING ADDRESS:
P.O. Box 227

CITY, STATE, ZIP:
Berryville AR 72616

PHONE & EXT: / FAX:
870-423-4414 /

EMAIL:

FAYETTEVILLE SHALE RELATED: **N**

FAYETTEVILLE SHALE VIOLATIONS: **N**

INSPECTION PARTICIPANTS

NAME/TITLE/PHONE/FAX/EMAIL/ETC.:
Michael Maynard, Lead Operator, City of Berryville;
Thom Vinson, Operations Supervisor, Jacobs;
Matt Benton, Project Manager, Jacobs;
Garrett Grimes, District 1 Inspector, ADEQ

CONTACTED DURING INSPECTION: **No**

AREA EVALUATIONS

(S=Satisfactory, M=Marginal, U=Unsatisfactory, N=Not Applicable/Evaluated)

M	PERMIT	S	FLOW MEASUREMENT	N	STORMWATER
S	RECORDS/REPORTS	S	LABORATORY	S	FACILITY SITE REVIEW
M	OPERATION & MAINTENANCE	S	EFFLUENT/RECEIVING WATER	S	SELF-MONITORING PROGRAM
S	SAMPLING	S	SLUDGE HANDLING/DISPOSAL	N	PRETREATMENT
N	OTHER:				

SUMMARY OF FINDINGS

The following violations were noted during the inspection:

Part I, Section A. of the permit;

1. Excursions for ammonia nitrogen (NH₃-N) and fecal coliform bacteria (FCB) were noted on the Discharge Monitoring Reports (DMR) for January and June 2018, respectively (Attachment 1). Non-compliance reports (NCR) were completed and submitted to ADEQ Office of Water Quality Enforcement Section.
2. Sublethal effects for *Ceriodaphnia dubia* were noted in the semiannual Whole Effluent Toxicity (WET) testing in 2018. The City of Berryville is currently undergoing a Toxicity Reduction Evaluation (TRE) and coordinating with the ADEQ Office of Water Quality Planning Branch.

Part III, B.1.A of the permit;

1. Formerly, the City of Berryville utilized two (2) sludge digesters for solids treatment. However, the City currently utilizes a belt press and only one digester is in service as storage (Photo #1). The other former digester is currently inactive with solids remaining. During the inspection, vegetation (including small trees) was observed within this inactive digester (Photo #2). This vegetation must be removed and the unit maintained. This was noted previously during the February 13, 2018, Compliance Evaluation Inspection.

The City of Berryville's WWTP appeared well maintained/operated during the inspection. Good housekeeping practices were being implemented and repairs noted from the response to the February 13, 2018, inspection were in good condition.

INSPECTOR'S SIGNATURE: <i>Garrett Grimes</i> Garrett Grimes	DATE: 12/6/2019
SUPERVISOR'S SIGNATURE: <i>Brent L. Walker</i> Brent L. Walker	DATE: 2/20/2020

SECTION A: PERMIT VERIFICATION	
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS	<input type="checkbox"/> S <input checked="" type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
DETAILS:	
1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
4. ALL DISCHARGES ARE PERMITTED:	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
SECTION B: RECORDKEEPING AND REPORTING EVALUATION	
RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
DETAILS:	
1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
a. DATES AND TIME(S) OF SAMPLING:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
b. EXACT LOCATION(S) OF SAMPLING:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
c. NAME OF INDIVIDUAL PERFORMING SAMPLING:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
d. ANALYTICAL METHODS AND TECHNIQUES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
e. RESULTS OF CALIBRATIONS:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
f. RESULTS OF ANALYSES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
g. DATES AND TIMES OF ANALYSES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
h. NAME OF PERSON(S) PERFORMING ANALYSES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR:	<input type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
SECTION C: OPERATIONS AND MAINTENANCE	
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED	<input type="checkbox"/> S <input checked="" type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
DETAILS:	
1. TREATMENT UNITS PROPERLY OPERATED:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
2. TREATMENT UNITS PROPERLY MAINTAINED: <u>Vegetation in digester.</u>	<input type="checkbox"/> S <input checked="" type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED: <u>750 kW generator</u>	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE: <u>SCADA</u>	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
5. ALL NEEDED TREATMENT UNITS IN SERVICE:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED: <u>Thom Vinson, Class IV; Mike Maynard, Class III</u>	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED: <u>Maintenance Connection</u>	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
9. STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
10. PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED:	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE
11. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR:	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
12. IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
13. HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
14. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT:	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
15. IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE

SECTION D: SAMPLING	
PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
DETAILS:	
1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
6. SAMPLE COLLECTION PROCEDURES ADEQUATE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
a. SAMPLES REFRIGERATED DURING COMPOSITING:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
b. PROPER PRESERVATION TECHNIQUES USED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
c. CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
7. IF MONITORING IS PERFORMED MORE OFTEN THAN REQUIRED ARE RESULTS REPORTED ON THE DMR:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
SECTION E: FLOW MEASUREMENT	
PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
DETAILS:	
1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: <u>18"</u> TYPE OF DEVICE: <u>Parshall Flume</u>	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
4. CALIBRATION FREQUENCY ADEQUATE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
5. RECORDS MAINTAINED OF CALIBRATION PROCEDURES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
6. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
7. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
8. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
9. HEAD MEASURED AT PROPER LOCATION:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
SECTION F: LABORATORY	
PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
DETAILS:	
1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(B) FOR SLUDGES) :	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
4. QUALITY CONTROL PROCEDURES ADEQUATE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
5. DUPLICATE SAMPLES ARE ANALYZED \geq 10% OF THE TIME:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
6. SPIKED SAMPLES ARE ANALYZED \geq 10% OF THE TIME:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
7. COMMERCIAL LABORATORY USED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
a. LAB NAME: <u>Environmental Testing Group (ETG), American Interplex, EcoTox</u>	
b. LAB ADDRESS: <u>1702 E. Central Avenue, Suite 10, Bentonville, AR 72712 (ETG); 8600 Kanis Rd., Little Rock, AR 72204 (American Interplex); PO Box 599, State University, AR 72467 (Ecotox)</u>	
c. PARAMETERS PERFORMED: <u>CBOD, TSS, TP, NH3-N, TDS, & FCB (ETG); WET Testing (American Interplex, Ecotox)</u>	
8. BIOMONITORING PROCEDURES ADEQUATE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
a. PROPER ORGANISMS USED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
b. PROPER DILUTION SERIES FOLLOWED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
c. PROPER TEST METHODS AND DURATION:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
d. RETESTS AND/OR TRE PERFORMED AS REQUIRED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE

SECTION G: EFFLUENT/RECEIVING WATERS OBSERVATIONS							
BASED ON VISUAL OBSERVATIONS ONLY						<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE	
DETAILS:							
OUTFALL #:	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	COLOR	OTHER
001	None	None	None	None	None	Clear	--
SECTION H: SLUDGE DISPOSAL							
SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS						<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE	
DETAILS:							
1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY:						<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE	
2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503:						<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE	
3. FOR LAND APPLIED SLUDGE, TYPE OF LAND APPLIED TO: (E.G., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE):							
SECTION I: SAMPLING INSPECTION PROCEDURES							
SAMPLE RESULTS WITHIN PERMIT REQUIREMENTS						<input type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
DETAILS:							
1. SAMPLES OBTAINED THIS INSPECTION:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
2. TYPE OF SAMPLE: <input type="checkbox"/> GRAB:___ <input type="checkbox"/> COMPOSITE:___ METHOD:___ FREQUENCY:___							
3. SAMPLES PRESERVED:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
4. FLOW PROPORTIONED SAMPLES OBTAINED:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
6. SAMPLE REPRESENTATIVE OF VOLUME AND NATURE OF DISCHARGE:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
7. SAMPLE SPLIT WITH PERMITTEE:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
SECTION J: STORM WATER POLLUTION PREVENTION PLAN							
STORM WATER MANAGEMENT MEETS PERMIT REQUIREMENTS						<input type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
DETAILS: <u>Refer to separate Industrial Stormwater Inspection report.</u>							
1. SWPPP UPDATED AS NEEDED:___ DATE OF LAST UPDATE:___						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
2. SITE MAP INCLUDING ALL DISCHARGES AND SURFACE WATERS:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
3. POLLUTION PREVENTION TEAM IDENTIFIED:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
4. POLLUTION PREVENTION TEAM PROPERLY TRAINED:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
5. LIST OF POTENTIAL POLLUTANT SOURCES:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
6. LIST OF POTENTIAL SOURCES AND PAST SPILLS AND LEAKS:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
7. ALL NON-STORM WATER DISCHARGES ARE AUTHORIZED:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
8. LIST OF STRUCTURAL BMPS:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
9. LIST OF NON-STRUCTURAL BMPS:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
10. BMPS PROPERLY OPERATED AND MAINTAINED:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
11. INSPECTIONS CONDUCTED AS REQUIRED:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	

FLOW CALCULATION SHEET

Date: **11/5/2019** Time: **11:59**

Head in Inches: **5** Feet: **0.4**

Type & Size of Primary Flow Measurement Device: **18" Parshall Flume**

Name & Model of Secondary Flow Measurement Device: **Miltronics Hydro Ranger**

Date of last Calibration of Secondary Flow Device: **6/6/2019**

Recorded Flow at Date & Time Listed Above: **1.0196 MGD** (Facility Flow Meter)

Calculated Flow at Date & Time Listed Above: **0.9475 MGD**

(Flow is calculated using flow charts in: ISCO Open Channel Flow Measurement Handbook-5th Edition)

% Error =	Recorded Value	-	Calculated Value	X 100
	Calculated Value			

% Error =	1.0196	-	0.9475	X 100
	0.9475			

% Error =	0.0721	X 100
	0.9475	

% Error =	0.0761	X 100
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% Error =	7.61	%
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Comments:

DMR Calculation Check

Reporting Period: From 2019 4 1 To 2019 4 30
 Year Month Day Year Month Day

Parameter Checked: NH3-N

	Loading Mass Mo. Avg. - lbs/day	Concentration Monthly Mo. Avg. - mg/l	7-day Avg. - mg/l
Reported Value:	<u>1.8</u>	<u>0.1</u>	<u>0.2</u>
Calculated Value:	<u>1.8</u>	<u>0.1</u>	<u>0.2</u>
Permit Value:	<u>32</u>	<u>1.6</u>	<u>3.9</u>

If calculated value does not equal reported value, explain:

Office of Water Quality Photographic Evidence Sheet

Location:	City of Berryville WWTP		
Photographer:	Garrett Grimes, District 1 Inspector	Date:	11/05/2019
Witness:		Time:	12:06
		Photo #:	1
Description:	Sludge storage in former digester.		



Photographer:	Garrett Grimes, District 1 Inspector	Date:	11/05/2019
Witness:		Time:	12:11
		Photo #:	2
Description:	Inactive digester with vegetation growing.		



Attachment 1: Record of effluent excursions for the past three (3) years.

Date	Parameter	Type	Value	Limit	NCR
Jan-18	NH3-N	Monthly Average (Lbs.)	113.9	80.1	Yes
Jan-18	NH3-N	Monthly Average (mg/L)	8.1	4	Yes
Jan-18	NH3-N	7-Day Average (mg/L)	15	6	Yes
Jun-18	FCB	Monthly Average (Geo)	751	1000	Yes
Jun-18	FCB	7-Day Average (Geo)	2647	2000	Yes

From: [Grimes, Garrett](#)
To: [McConnell, Melissa](#)
Cc: [Walker, Brent](#)
Subject: FW: ADEQ Inspection response letter
Date: Friday, March 13, 2020 3:03:25 PM
Attachments: [200312085826_0001.pdf](#)

Attached is the City of Berryville's response to their Compliance Evaluation Inspection (PDS 111133).

Thank you,
Garrett

From: Jay Lee [mailto:jaylee@berryville.com]
Sent: Thursday, March 12, 2020 9:59 AM
To: Grimes, Garrett
Cc: Benton, Matthew/FAY
Subject: ADEQ Inspection response letter

Garrett,

Attached you will find the City of Berryville's response letter regarding your recent inspection visit to the Berryville WWTP. Please don't hesitate to contact me if you have any questions or need any additional information. Also, please let me know if you would like the original signed letter to be mailed to you.

Sincerely,
Jay Lee

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Thanks,
Jay Lee
Admin. Assistant
City of Berryville, AR
(870) 423-4414

City of
BERRYVILLE

Mayor's Office

P.O. Box 227

Berryville, AR 72616

Phone (870) 423-4414 Fax (870) 423-4195

March 10, 2020

Office of Water Quality Compliance Branch
Arkansas Department of Environmental Quality
5301 Northshore Dr
North Little Rock, AR 72118-5317
(501) 682-0880

Subject: City of Berryville WWTP Inspection
AFIN: 08-00034 Permit No.: AR0021792

Dear Mr. Grimes:

This letter is in response to your communication dated February 25, 2020 detailing your findings during the November 5, 2019 Compliance Evaluation Inspection of the Berryville WWTP. I have reviewed the "Summary of Findings" section of your report and propose the following corrective actions:

- Non-compliance reports were completed and submitted to the ADEQ Office of Water Quality Enforcement for excursions of ammonia nitrogen and fecal coliform noted in the Discharge Monitor Reports for January and June 2018. Facility staff will continue to monitor the process and make corrective changes to avoid future excursions.
- The City of Berryville is undergoing a Toxicity Reduction Evaluation (TRE) due to the sub-lethal effects to *Ceriodaphnia dubia* during 2018 Whole Effluent Toxicity testing. Facility Staff and the City of Berryville will continue to work with American Interplex Corporation, FTN Associates, and the ADEQ to complete the TRE and report any findings.
- Existing vegetation will be skimmed from the surface of the old sludge digester. To prevent future vegetative buildup, we will repeat this process on a yearly basis. We anticipate starting no later than March 15, 2020 and concluding the cleanup by May 30, 2020. Photos and a full description of the work will be sent to you upon completion.

Regarding the inactive digester, your report states that the existence of vegetation was noted during the February 13, 2018 Compliance Evaluation Inspection. Upon reviewing the 2018 inspection report, I found no mention of vegetation in that digester. The 2018 report, however, did state that vegetation was present in the active sludge digester which was removed and documented in a March 27, 2018 letter to the Office of Water Quality Compliance. I have attached this letter for your reference.

If you have any questions or need additional information, please contact Matt Benton at matthew.benton@jacobs.com or 479-790-8920. I am also available at mayortim@berryville.com or by telephone at 870-423-4414.

Sincerely,



Mayor Tim McKinney

From: [Grimes, Garrett](#)
To: [McConnell, Melissa](#)
Subject: FW: March 27, 2018 letter
Date: Friday, March 13, 2020 3:04:43 PM
Attachments: [2018-03-27 Ltr from McKinney to ADEQ re 2018 inspection.pdf](#)

Additional details of the City's response.

From: Jay Lee [mailto:jaylee@berryville.com]
Sent: Thursday, March 12, 2020 10:04 AM
To: Grimes, Garrett
Subject: March 27, 2018 letter

Garrett,

Attached you will also find the March 27, 2018 letter referenced in the response I just sent you. Sorry for not including that earlier.

Sincerely,
Jay Lee

--

Thanks,
Jay Lee
Admin. Assistant
City of Berryville, AR
(870) 423-4414

City of Berryville

Public Works Department

P.O. Box 227
305 East Madison
Berryville, Arkansas 72616

Mayor, Tim McKinney

Phone: 870-423-4414
Fax: 870-423-4195
E-mail: mayortim@berryville.com

March 27, 2018

Office of Water Quality Compliance Branch
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118
(501) 682-0744

RE: City of Berryville WWTP Inspection
AFIN: 08-00034 Permit No.: AR0021792

Dear Mr. Grimes,

Transmitted herewith are written responses and photos of corrective actions for permit violations noted under **SUMMARY OF FINDINGS** during the February 13th Compliance Evaluation Inspection for Permit Number AR0021792, AFIN 08-00034, City of Berryville WWTP.

Corrective actions completed at this time by facility staff include:

- Placement of tarps and straw bales at all leaks from treatment units to contain & absorb, as well as capture solids, within the vicinity of the identified cracks.
- Removal of established vegetation from the sludge dewatering tank.
- Contacting multiple vendors with requests for treatment unit repair quotes.

Facility staff and City of Berryville staff will continue to pursue treatment unit repair investigations, development necessary design plans and complete construction repairs to the identified areas of listed treatment units.

Please contact Mayo Miller, mayo.miller@ch2m.com or 435-690-1955, for additional information or if you have any questions. I am available at mayortim@berryville.com or by telephone at 870-423-4414.

Kind Regards,



City of Berryville

Tim McKinney
Mayor
City of Berryville

Enclosures: Corrective Action Photos
CC: Mayo Miller, Jacobs



Public Works Department

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Mayor, Tim McKinney

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Fax: 870-423-4195

Berryville, Arkansas 72616

March 13, 2018 Inspection Report Response: Photo Documentation

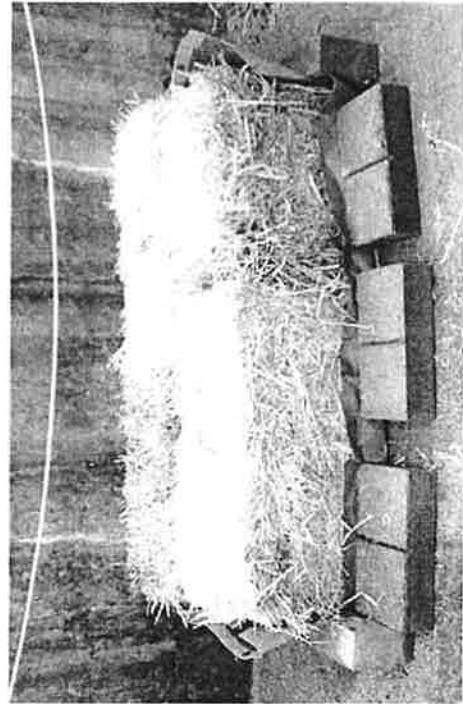
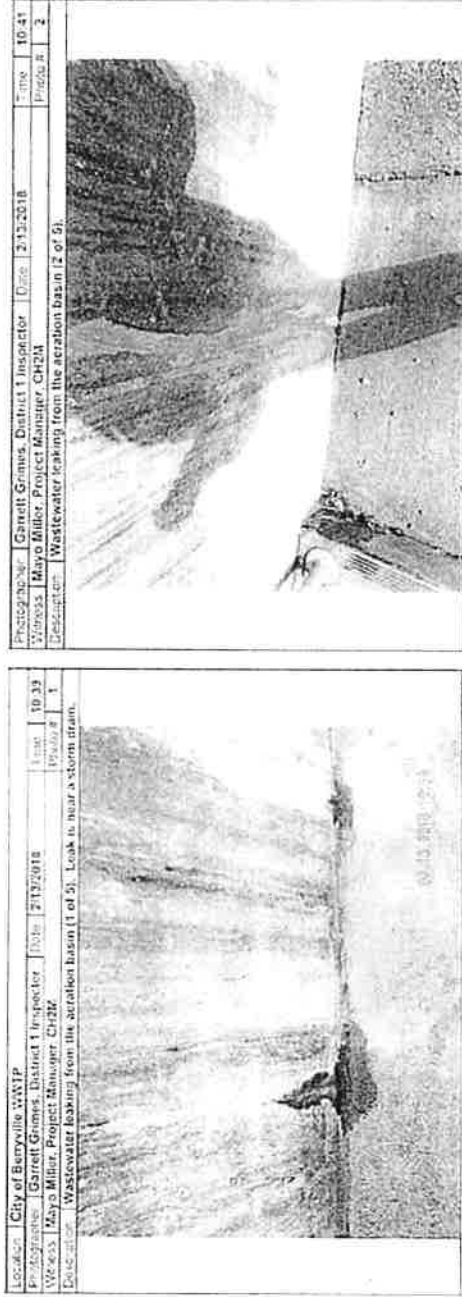


Figure 1 Photo No. 1 & 2 Corrective Action: Straw & Tarp Containment



Public Works Department

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March 13, 2018 Inspection Report Response: Photo Documentation continued ...

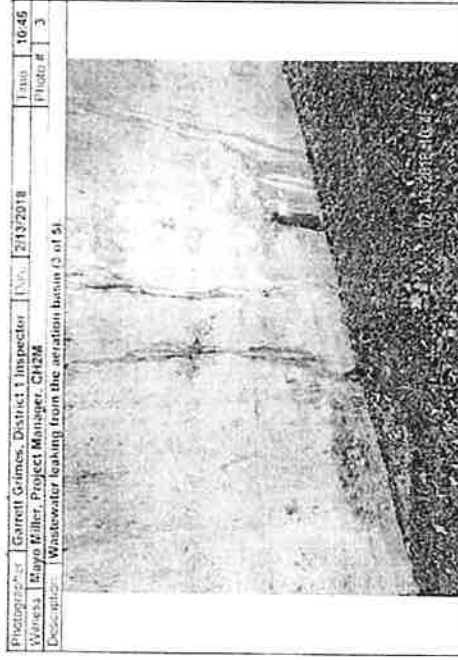


Figure 2 Photo No. 3 Corrective Action: Straw & Tarp Containment

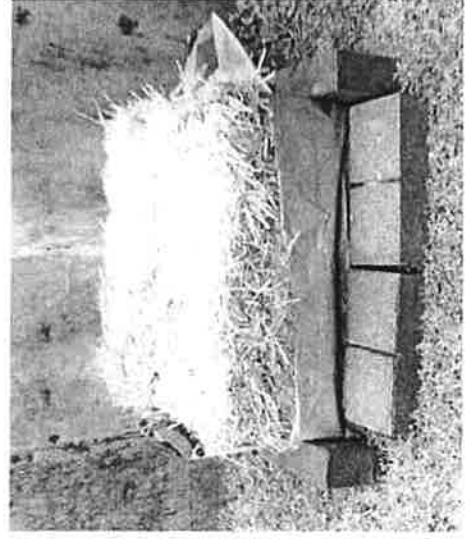


Figure 3 Photo No. 4 Corrective Action: Straw & Tarp Containment



Public Works Department

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March 13, 2018 Inspection Report Response: Photo Documentation continued ...

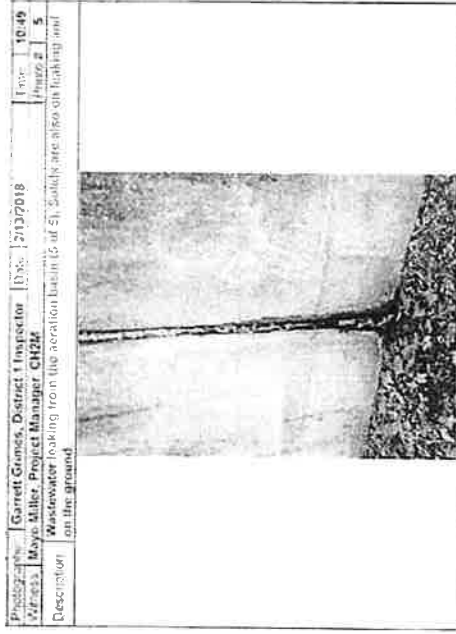


Figure 4 Photo No. 5 Corrective Action: Straw & Tarp Containment

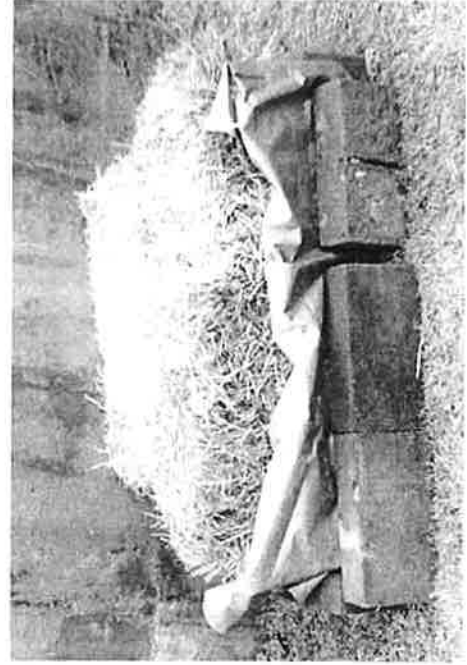


Figure 5 Photo No. 6 Corrective Action: Straw & Tarp Containment



Public Works Department
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March 13, 2018 Inspection Report Response: Photo Documentation continued ...



Figure 6 Photo No. 7 Corrective Action: Straw & Tarp Containment

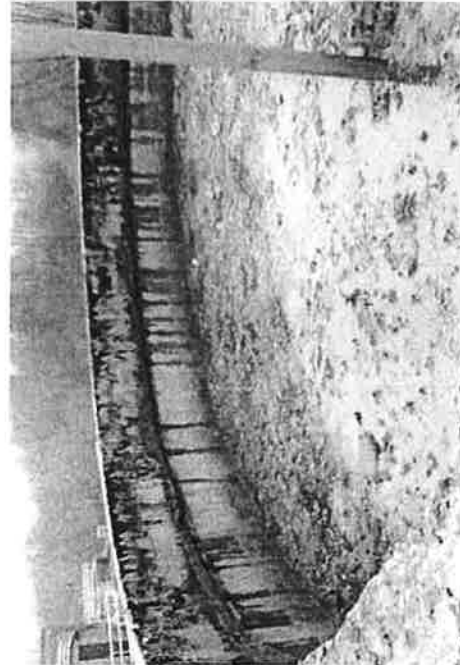
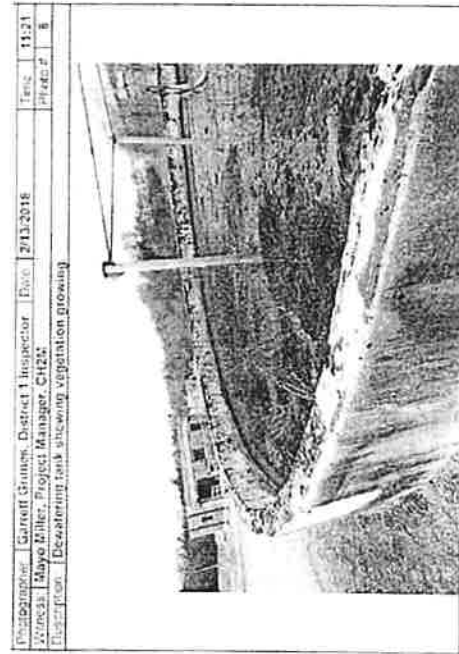


Figure 7 Photo No. 8 Corrective Action: Vegetation Removal

From: [Grimes, Garrett](#)
To: [McConnell, Melissa](#)
Cc: [Walker, Brent](#)
Subject: FW: ADEQ Inspection response letter
Date: Friday, March 13, 2020 3:03:25 PM
Attachments: [200312085826_0001.pdf](#)

Attached is the City of Berryville's response to their Compliance Evaluation Inspection (PDS 111133).

Thank you,
Garrett

From: Jay Lee [mailto:jaylee@berryville.com]
Sent: Thursday, March 12, 2020 9:59 AM
To: Grimes, Garrett
Cc: Benton, Matthew/FAY
Subject: ADEQ Inspection response letter

Garrett,

Attached you will find the City of Berryville's response letter regarding your recent inspection visit to the Berryville WWTP. Please don't hesitate to contact me if you have any questions or need any additional information. Also, please let me know if you would like the original signed letter to be mailed to you.

Sincerely,
Jay Lee

--

Thanks,
Jay Lee
Admin. Assistant
City of Berryville, AR
(870) 423-4414

City of
BERRYVILLE

Mayor's Office

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Berryville, AR 72616

Phone (870) 423-4414 Fax (870) 423-4195

March 10, 2020

Office of Water Quality Compliance Branch
Arkansas Department of Environmental Quality
5301 Northshore Dr
North Little Rock, AR 72118-5317
(501) 682-0880

Subject: City of Berryville WWTP Inspection
AFIN: 08-00034 Permit No.: AR0021792

Dear Mr. Grimes:

This letter is in response to your communication dated February 25, 2020 detailing your findings during the November 5, 2019 Compliance Evaluation Inspection of the Berryville WWTP. I have reviewed the "Summary of Findings" section of your report and propose the following corrective actions:

- Non-compliance reports were completed and submitted to the ADEQ Office of Water Quality Enforcement for excursions of ammonia nitrogen and fecal coliform noted in the Discharge Monitor Reports for January and June 2018. Facility staff will continue to monitor the process and make corrective changes to avoid future excursions.
- The City of Berryville is undergoing a Toxicity Reduction Evaluation (TRE) due to the sub-lethal effects to *Ceriodaphnia dubia* during 2018 Whole Effluent Toxicity testing. Facility Staff and the City of Berryville will continue to work with American Interplex Corporation, FTN Associates, and the ADEQ to complete the TRE and report any findings.
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Regarding the inactive digester, your report states that the existence of vegetation was noted during the February 13, 2018 Compliance Evaluation Inspection. Upon reviewing the 2018 inspection report, I found no mention of vegetation in that digester. The 2018 report, however, did state that vegetation was present in the active sludge digester which was removed and documented in a March 27, 2018 letter to the Office of Water Quality Compliance. I have attached this letter for your reference.

If you have any questions or need additional information, please contact Matt Benton at matthew.benton@jacobs.com or 479-790-8920. I am also available at mayortim@berryville.com or by telephone at 870-423-4414.

Sincerely,



Mayor Tim McKinney

From: [Grimes, Garrett](#)
To: [McConnell, Melissa](#)
Subject: FW: March 27, 2018 letter
Date: Friday, March 13, 2020 3:04:43 PM
Attachments: [2018-03-27 Ltr from McKinney to ADEQ re 2018 inspection.pdf](#)

Additional details of the City's response.

From: Jay Lee [mailto:jaylee@berryville.com]
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To: Grimes, Garrett
Subject: March 27, 2018 letter

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Sincerely,
Jay Lee

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Thanks,
Jay Lee
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City of Berryville

Public Works Department

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March 27, 2018

Office of Water Quality Compliance Branch
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118
(501) 682-0744

RE: City of Berryville WWTP Inspection
AFIN: 08-00034 Permit No.: AR0021792

Dear Mr. Grimes,

Transmitted herewith are written responses and photos of corrective actions for permit violations noted under **SUMMARY OF FINDINGS** during the February 13th Compliance Evaluation Inspection for Permit Number AR0021792, AFIN 08-00034, City of Berryville WWTP.

Corrective actions completed at this time by facility staff include:

- Placement of tarps and straw bales at all leaks from treatment units to contain & absorb, as well as capture solids, within the vicinity of the identified cracks.
- Removal of established vegetation from the sludge dewatering tank.
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Kind Regards,



City of Berryville

Tim McKinney
Mayor
City of Berryville

Enclosures: Corrective Action Photos
CC: Mayo Miller, Jacobs



Public Works Department

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Berryville, Arkansas 72616

March 13, 2018 Inspection Report Response: Photo Documentation

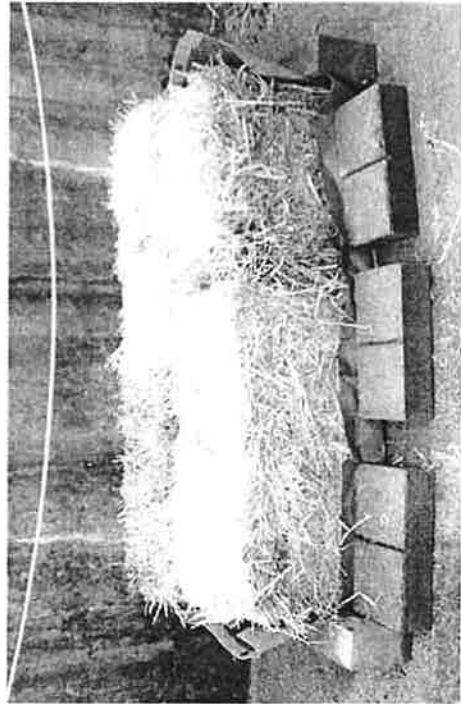
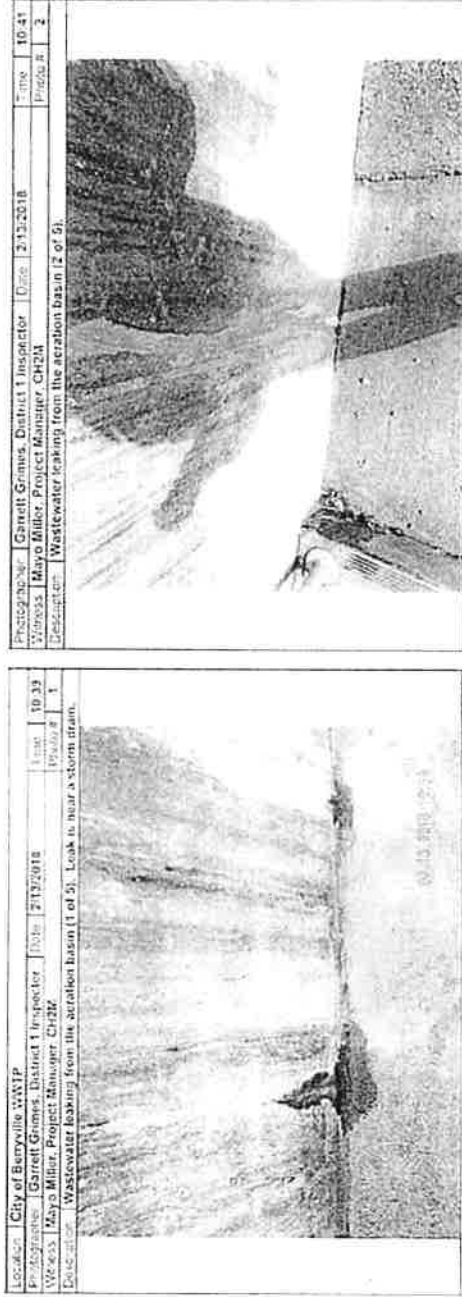


Figure 1 Photo No. 1 & 2 Corrective Action: Straw & Tarp Containment



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March 13, 2018 Inspection Report Response: Photo Documentation continued ...

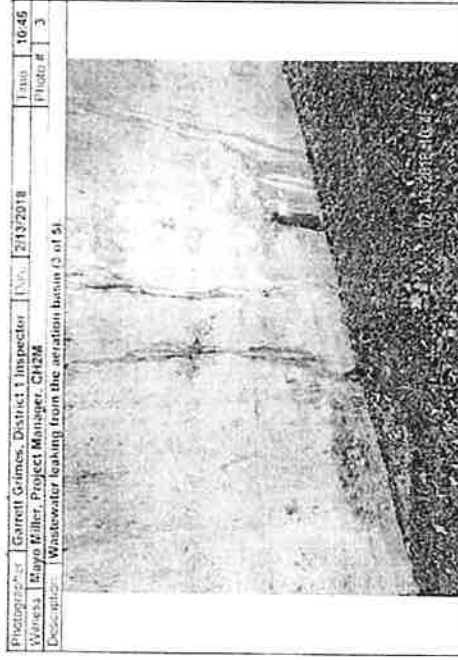


Figure 2 Photo No. 3 Corrective Action: Straw & Tarp Containment

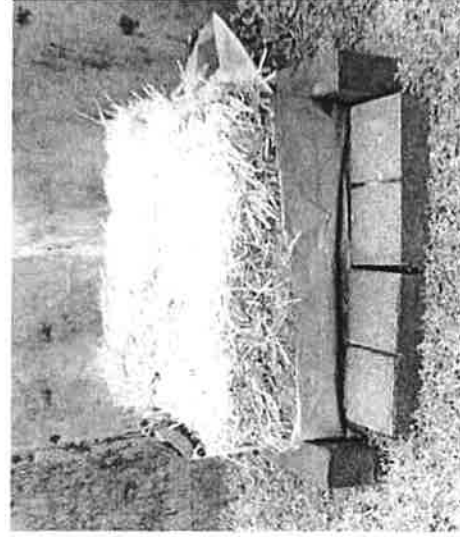


Figure 3 Photo No. 4 Corrective Action: Straw & Tarp Containment



Public Works Department

P.O. Box 227

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Berryville, Arkansas 72616

March 13, 2018 Inspection Report Response: Photo Documentation continued ...

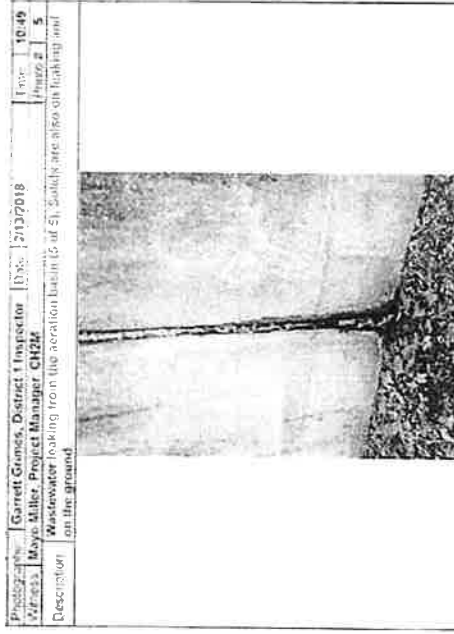


Figure 4 Photo No. 5 Corrective Action: Straw & Tarp Containment

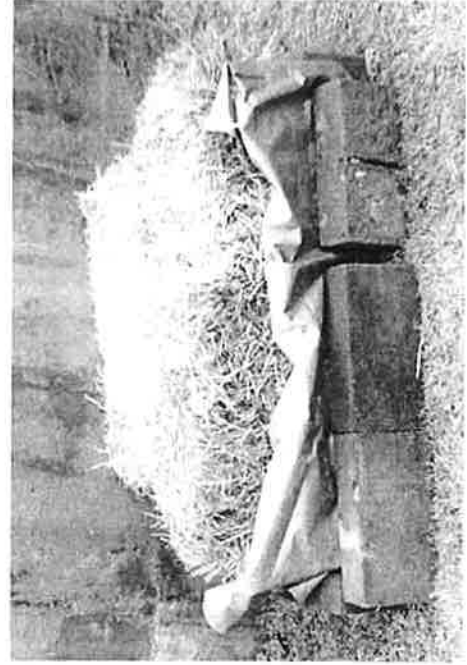


Figure 5 Photo No. 6 Corrective Action: Straw & Tarp Containment



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March 13, 2018 Inspection Report Response: Photo Documentation continued ...



Figure 6 Photo No. 7 Corrective Action: Straw & Tarp Containment

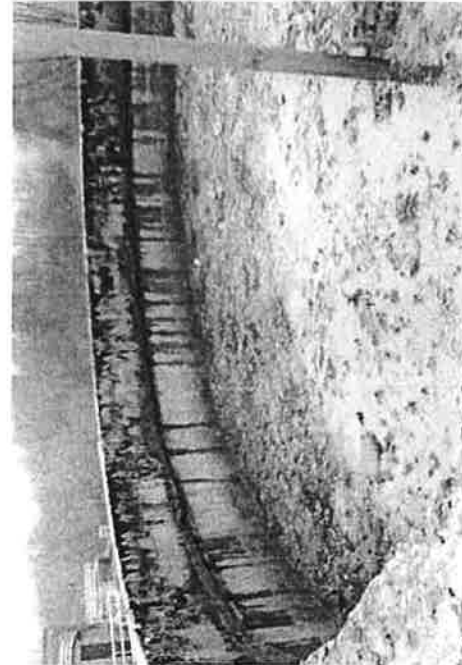


Figure 7 Photo No. 8 Corrective Action: Vegetation Removal

ADEQ

A R K A N S A S
Department of Environmental Quality

March 27, 2020

Tim McKinney, Mayor
City of Berryville
P.O. Box 227
Berryville, AR 72616

RE: Facility Name Inspection
AFIN: 08-00034 Permit No.: AR0021792

Honorable Mayor McKinney:

I have reviewed your March 12, 2020, response pertaining to my November 5, 2019, Compliance Evaluation Inspection of the above referenced facility. However, the information provided does not sufficiently addresses the violations referenced in my inspection report. Please provide the following:

Your response states that existing vegetation will be skimmed from the surface of the old sludge digester. Your response also states this work will begin no later than March 15, 2020, and conclude by May 30, 2020, and that photographs and a full description of work will be submitted upon completion. Please submit these documents upon completion.

The above item requires your immediate attention. Please submit a written response to these items to the Office of Water Quality Compliance Branch of this Department. This response should be mailed to the address at the bottom of the first page of the letter or e-mailed to Water-Inspection-report@adeq.state.ar.us. This response is due by **June 1, 2020**.

Thank you for your attention to this matter. Should you have any questions, feel free to contact me at 479-267-0811, ext. 16 or you may e-mail me at grimesg@adeq.state.ar.us.

Sincerely,



Garrett Grimes
District 1 Field Inspector
Office of Water Quality

City of
BERRYVILLE

Mayor's Office

P.O. Box 227

Berryville, AR 72616

Phone (870) 423-4414 Fax (870) 423-4195

May 22, 2020

Office of Water Quality Compliance Branch
Arkansas Department of Environmental Quality
5301 Northshore Dr
North Little Rock, AR 72118-5317
(501) 682-0880

Subject: City of Berryville WWTP Inspection
AFIN: 08-00034 Permit No.: AR0021792

Dear Mr. Grimes,

Transmitted herewith are photos documenting the corrective action taken to remove vegetation from the inactive sludge digester documented in the **SUMMARY OF FINDINGS** section of the report for the November 5, 2019 on-site Compliance Inspection Evaluation for Permit No. AR0021792, AFIN 08-0034, City of Berryville WWTP. The proposed timeline in our response letter dated March 10th was adhered to, and the cleanup was completed on May 13th. Approximately 5.5 cubic yards of vegetation was removed from the digester. In the future, facility staff will perform quarterly inspections of the sludge digester and remove any visible regrowth.

If you have any questions or need additional information, please contact Matt Benton at matthew.benton@jacobs.com or 479-790-8920.

Sincerely,



Mayor Tim McKinney

Enclosure

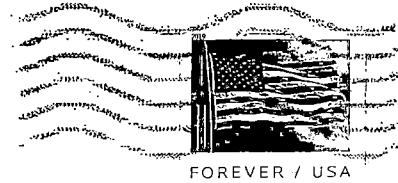
City of Berryville

P.O. BOX 227 - 305 E. MADISON

Berryville, Arkansas 72616

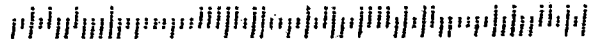
AR 72616 AR 727

23 MAY 2020 PM 2 L



ADEQ Office of Water Quality Compliance Branch
Attn: Garrett Grimes
5301 Northshore Dr
North Little Rock, AR 72118-5317

72118-531799



ADEQ

A R K A N S A S
Department of Environmental Quality

July 22, 2020

Tim McKinney, Mayor
City of Berryville
P.O. Box 227
Berryville, AR 72616

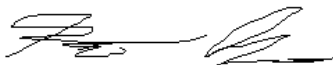
RE: Adequate Response to Compliance Evaluation Inspection
AFIN: 08-00034 Permit No.: AR0021792

Honorable Mayor McKinney:

The Department has received your March 12 and May 22, 2020, responses to the Compliance Evaluation Inspection conducted on November 5, 2019. Your response adequately addresses the request in the Summary of Findings section of the report. Acceptance of this response by the Department does not preclude any future enforcement action deemed necessary at this site or any other site.

If I need further information concerning this matter, I will contact you. Thank you for your attention to this matter. If I can be any assistance please feel free to contact me at grimesg@adeq.state.ar.us or 479.267.0811 ext. 16.

Sincerely,



Garrett Grimes
District 1 Field Inspector
Office of Water Quality