

SECTION A - PERMIT VERIFICATION

PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS S M U NA (FURTHER EXPLANATION ATTACHED No)
 DETAILS:

- 1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE Y N NA
- 2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES Y N NA
- 3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT Y N NA
- 4. ALL DISCHARGES ARE PERMITTED Y N NA

SECTION B - RECORDKEEPING AND REPORTING EVALUATION

RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT. S M U NA (FURTHER EXPLANATION ATTACHED No)
 DETAILS:

- 1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRs. Y N NA
- 2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE. S M U NA
 - a) DATES, TIME(S) AND LOCATION(S) OF SAMPLING Y N NA
 - b) NAME OF INDIVIDUAL PERFORMING SAMPLING Y N NA
 - c) ANALYTICAL METHODS AND TECHNIQUES. Y N NA
 - d) RESULTS OF ANALYSES AND CALIBRATIONS. Y N NA
 - e) DATES AND TIMES OF ANALYSES. Y N NA
 - f) NAME OF PERSON(S) PERFORMING ANALYSES. Y N NA
- 3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE. **Contract Laboratory** S M U NA
- 4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR. S M U NE
- 5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA. Y N NA

SECTION C - OPERATIONS AND MAINTENANCE

TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED. S M U NA (FURTHER EXPLANATION ATTACHED No)
 DETAILS:

- 1. TREATMENT UNITS PROPERLY OPERATED. S M U NA
- 2. TREATMENT UNITS PROPERLY MAINTAINED. S M U NA
- 3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED. (Back up generator on site) S M U NA
- 4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE. S M U NA
- 5. ALL NEEDED TREATMENT UNITS IN SERVICE. S M U NA
- 6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED. (1 class II, 1 class III) S M U NA
- 7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED. (Updated monthly by computer) S M U NE
- 8. OPERATION AND MAINTENANCE MANUAL AVAILABLE. Y N NA
- STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED. Y N NA
- PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED. Y N NE

SECTION C - OPERATIONS AND MAINTENANCE (CONT'D)

9. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR? Y N NA
 IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED? Y N NA
 HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS? Y N NA

10. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT? Y N NA
 IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT? Y N NA

SECTION D - SAMPLING

PERMITTEE Sampling MEETS PERMIT REQUIREMENTS. S M U NA (FURTHER EXPLANATION ATTACHED No).
 DETAILS: **Permit requires 3 hr. composite sample for CBOD, TSS, NH3-N and Nitrate + Nitrite Nitrogen, 3 times per month.**

1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT. Y N NA

2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES. Y N NA

3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT. Y N NA

4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT. Y N NA

5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT. Y N NA

6. SAMPLE COLLECTION PROCEDURES ADEQUATE Y N NA

a) SAMPLES REFRIGERATED DURING COMPOSITING. Y N NA

b) PROPER PRESERVATION TECHNIQUES USED. Y N NA

c) CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136 Y N NA

7. IF MONITORING AND ANALYSES ARE PERFORMED MORE OFTEN THAN REQUIRED BY PERMIT, ARE THE RESULTS REPORTED IN PERMITTEE'S SELF-MONITORING REPORT? Y N NA

SECTION E - FLOW MEASUREMENT

PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS. S M U NA (FURTHER EXPLANATION ATTACHED No)
 DETAILS:

1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED. Y N NA
 TYPE OF DEVICE 3 foot Rectangular Weir with End Constrictions

2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED. Y N NA

3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED. Y N NA

4. CALIBRATION FREQUENCY ADEQUATE. (DATE OF LAST CALIBRATION (April 12, 2006)) Y N NA
 RECORDS MAINTAINED OF CALIBRATION PROCEDURES. Y N NA
 CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE. Y N NA

5. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE. Y N NA

6. HEAD MEASURED AT PROPER LOCATION. Y N NA

7. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES. Y N NA

SECTION F - LABORATORY

PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS. S M U NA (FURTHER EXPLANATION ATTACHED No)
 DETAILS:

1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(b) FOR SLUDGES) Y N NA

SECTION F - LABORATORY (CONT'D)

- 2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED Y N NA
- 3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT. S M U NA
- 4. QUALITY CONTROL PROCEDURES ADEQUATE. S M U NA
- 5. DUPLICATE SAMPLES ARE ANALYZED, 100 % OF THE TIME Y N NA
- 6. SPIKED SAMPLES ARE ANALYZED, 100 % OF THE TIME. Y N NA
- 7. COMMERCIAL LABORATORY USED. (State certified) Y N NA

LAB NAME McClelland Construction Engineers
 LAB ADDRESS P.O. Box 34087, Little rock, Ar 72204-34087
 PARAMETERS PERFORMED TSS, DO, pH, NH3-N, NO3-N, FC, CBOD, Flow

SECTION G - (EFFLUENT)/RECEIVING WATERS OBSERVATIONS. S M U NA (FURTHER EXPLANATION ATTACHED No).

Based on visual observations only.

OUTFALL NO.	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOAT SOL.	COLOR	OTHER
001	None	None	None	None	None	Clear	

Comments: **A slight algal growth was noted in the receiving stream above and below the discharge point.**

SECTION H - SLUDGE DISPOSAL

SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS. S M U NA (FURTHER EXPLANATION ATTACHED No).
 DETAILS: **Grit and Bar screen waste disposed at a class 1 landfill. The sludge is dewatered in drying beds and transported to a class I landfill for disposal.**

- 1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY. S M U NA
- 2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503. S M U NA
- 3. FOR LAND APPLIED SLUDGE, TYPE OF LAND APPLIED TO: Central Landfill, (e.g., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE)

SECTION I - SAMPLING INSPECTION PROCEDURES (FURTHER EXPLANATION ATTACHED No)

- 1. SAMPLES OBTAINED THIS INSPECTION. Y N NA
- 2. TYPE OF SAMPLE OBTAINED - N/A
 GRAB _____ COMPOSITE SAMPLE _____ METHOD _____ FREQUENCY _____
- 3. SAMPLES PRESERVED. Y N NA
- 4. FLOW PROPORTIONED SAMPLES OBTAINED. Y N NA
- 5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE. Y N NA
- 6. SAMPLE REPRESENTATIVE OF VOLUME AND NATURE OF DISCHARGE. Y N NA
- 7. SAMPLE SPLIT WITH PERMITTEE. Y N NA
- 8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED. Y N NA
- 9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT. Y N NA

FLOW CALCULATION SHEET

Field Data: Date 02/05/07 Time 1105

Head in Inches 1.75 = 0.14 Feet

Type & Size of Primary Flow Measurement Device

3 Foot Rectangular Weir with Contractions

Name & Model of Secondary Flow Measurement Device

Sonic Meter

Recorded Flow at date & time listed above .23 MGD

According to the ISCO Open Channel Flow Measurement Handbook-5th Edition flows below 0.2 inches of head (0.570 MGD) can not be accurately measured with this type of primary flow measurement devise.

DMR Calculation Check

Parameter Checked: Total Suspended Solids (TSS)

Reporting Period:	Year	Month	Day	To	Year	Month	Day
	06	10	01		06	10	28

Concentration	Loading Mass Monthly Ave.(lbs/day)	Monthly Ave. (mg/l)	7-day Ave. (mg/l)
Reported Value:	35.7	9.23	11.0
Calculated Value:	59.2	9.52	11.0
Permit Value:	91	15	23

If calculated value does not equal reported value, explain: The values reported in the DMR do not match the calculated values. I phoned the McClelland Lab. and spoke with the laboratory manager, Ms. Amber Bussell, about the difference. It seems that she was using the flow from the day the samples were picked up rather than the day the 3 hour composite sample was collected. The difference in flow accounts for the differences noted in monthly average concentration and monthly average loading. Ms. Bussell stated that she will correct the DMR and resubmit it to the facility.

ADEQ

ARKANSAS
Department of Environmental Quality

February 16, 2007

James Henderson, Water and Wastewater Director
City of Mt. View
P.O. Drawer 360
Mt. View, AR 72560

Re: AFIN No. 69-00011 NPDES Permit No. AR0020117

Dear Mr. Henderson:

On February 5, 2007, I performed a routine permit compliance inspection of the Mt. View Wastewater Treatment Plant in accordance with the provisions of the federal Clean Water Act, the Arkansas Water and Air Pollution Control Act and the regulations promulgated thereunder. During the course of this inspection the following violations were noted:

1. The mass loading calculations and monthly average concentrations for the October 2006 Discharge Monitoring Report (DMR) was found to be in error. It appears that the wrong flow values were utilized in the calculations submitted in the October DMR. Rather than using the flow value for the day the composite sample was collected, the value for the day the sample was picked up and delivered to the lab was used. Since flow through the plant can vary significantly, it is important to use the correct value.
2. Part II, C, 2 of the permit requires that flow measuring devices be used which are capable of measuring flows with a maximum deviation of less than 10% from true discharge rates throughout the range of discharge volumes. The primary flow measuring device used at the plant is a Contracted 3 Foot Rectangular Weir. According to the ISCO Open Channel Flow Measurement Handbook-5th Edition, flows below 0.2 inches of head (0.570 MGD) can not be accurately measured with this type of primary flow measurement device. A review of flow records for the plant indicated that daily flow through the plant is frequently below this volume. Accurate flow measurement values are important for a variety of reasons but particularly for calculating loading rates in the plant effluent and determining compliance with the permit discharge limits.

The aforementioned violations require your immediate attention. Please submit a written response to these findings to the NPDES Enforcement Section of this Department. This response should contain documentation describing the course of action taken, or to be taken to correct each item noted. The written response is due by **March 7, 2006**.

Letter to James Henderson
February 16, 2007
Page 2



I appreciate the cooperation and courtesy of the staff during my site visit. If you have any questions concerning this inspection or the formal response, please contact me at 870-446-2770.



Sincerely,

Tony L. Morris
District Field Inspector
ADEQ Water Division

cc: NPDES Branch

Arkansas Department of Environmental Quality (ADEQ) Official Photograph Sheet

Location:		Mt. View POTW, Stone County					
Photographer:		Tony Morris			Witness:		
Photo #	1	Of	4		Date:	02/05/07	Time: 11:49
Description:		An overview of the plant from the outfall. The concrete structure left of the crane is the chlorinator with the primary flow measuring device contained within. The green structure is the bio-tower.					
							
Photographer:		Tony Morris			Witness:		
Photo #	2	Of	4		Date:	02/05/07	Time: 11:47
Description:		The primary flow measuring device consisting of a 3 foot rectangular weir with contractions. The head at this time was approximately 0.14 feet.					
							

Location:	Mt. View POTW, Stone County						
Photographer:	Tony Morris				Witness:		
Photo #	3	Of	4		Date:	02/05/07	Time: 11:48
Description:	Hughs Creek at outfall 001. The discharge from the POTW is on the left side of the creek. The effluent was clear with no foam, color or odor.						
							
Photographer:	Tony Morris				Witness:		
Photo #	4	Of	4		Date:	02/05/07	Time: 12:52
Description:	Looking into the City Park Lift Station. One of the pumps has been removed for repairs.						
							

019575



MOUNTAIN VIEW WATER & WASTEWATER DEPARTMENT

311 West Main Street
Drawer 360
Mountain View Arkansas 72560
Phone (870) 269-3293
Fax (870) 269-9158

March 2, 2007

Tony L Morris
District Field Inspector
ADEQ Water Division
8001 National Drive
P.O. Box 8913
Little Rock, Arkansas 72219-8913

Re: ADEQ Site Inspection
Wastewater Treatment Plant
AFIN # 6900011
NPDES Permit # AR0020117

Dear Mr. Morris,

This letter is in response to your letter of February 16, 2007.

In response to item #1 of your inspection report concerning mass loading and monthly average concentrations, enclosed you will find a copy of a report from the City's Environmental Laboratory. I hope this will satisfy this issue.

Under item #2 of the report, it states that flows below 0.2 inches of head (0.57 mgd) cannot be accurately measured with this type of primary flow measurement device. Calculations show 0.2 inches of head results in a flow of approximately 18,000 gallons per day, not 570,000. I do not have access to the ISCO open Channel Flow Measurement Handbook-5th Edition, and I am not aware of any published limit on the amount of water over a rectangular weir that can be accurately measured.

Please provide the documentation that is referred to. It would seem that any limit would be based on the accuracy of the measuring device. We would be happy to review this further after we receive the referred to documentation.

Please call if you have any further questions or comments.

Sincerely,

James Henderson
Water & Wastewater, Director



Environmental Laboratories

P.O. Box 34087

Little Rock, Arkansas 72203-4087

501-378-7808 • FAX 501-376-4677

James Henderson, Water and Wastewater Director
City of Mt. View
P.O. Drawer 360
Mt. View, AR 72560

RE: Inspection letter

Dear Mr. Henderson-

The following addresses issue number 1 on your letter copied from ADEQ dated February 16, 2007.

#1 - The mass loading and monthly average concentrations for the October 2006 DMR were miscalculated. The DMR has been corrected and sent in. We have take steps to insure this does not happen again.

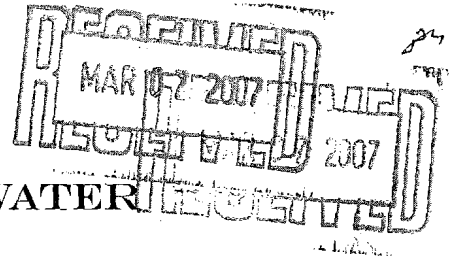
Please let me know if you need anything further.

Sincerely,

A handwritten signature in black ink, appearing to read "AB", is written over a horizontal line.

Amber Bussell
Laboratory Manager

019575
SCN



MOUNTAIN VIEW WATER & WASTEWATER DEPARTMENT

311 West Main Street
Drawer 360
Mountain View Arkansas 72560
Phone (870) 269-3293
Fax (870) 269-9158

-SL to Frank

March 2, 2007

Tony L Morris
District Field Inspector
ADEQ Water Division
8001 National Drive
P.O. Box 8913
Little Rock, Arkansas 72219-8913

Re: ADEQ Site Inspection
Wastewater Treatment Plant
AFIN # 6900011
NPDES Permit # AR0020117

Dear Mr. Morris,

This letter is in response to your letter of February 16, 2007.

In response to item #1 of your inspection report concerning mass loading and monthly average concentrations, enclosed you will find a copy of a report from the City's Environmental Laboratory. I hope this will satisfy this issue.

Under item #2 of the report, it states that flows below 0.2 inches of head (0.57 mgd) cannot be accurately measured with this type of primary flow measurement device. Calculations show 0.2 inches of head results in a flow of approximately 18,000 gallons per day, not 570,000. I do not have access to the ISCO open Channel Flow Measurement Handbook-5th Edition, and I am not aware of any published limit on the amount of water over a rectangular weir that can be accurately measured.

Please provide the documentation that is referred to. It would seem that any limit would be based on the accuracy of the measuring device. We would be happy to review this further after we receive the referred to documentation.

Please call if you have any further questions or comments.

Sincerely,

James Henderson
Water & Wastewater, Director