



**SECTION A - PERMIT VERIFICATION**

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

- 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. DETAILS: \* Chain of Custody was not filled out properly for contract lab (see letter for details).  S  M  U  NA (FURTHER EXPLANATION ATTACHED No)

- 1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRs. Monthly averages for CBOD5, TSS, NH3-N, and TP are calculated incorrectly, and are therefore reported inaccurately.  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. DETAILS:  S  M  U  NA (FURTHER EXPLANATION ATTACHED No)

- 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. No back-up generator at plant.  S  M  U  NA
- 4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE. No alarm system at plant.  S  M  U  NA
- 5. ALL NEEDED TREATMENT UNITS IN SERVICE.  S  M  U  NA
- 6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED. 2 Class IV, 1 Class II, 1Class I  S  M  U  NA
- 7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED.  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:

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  
On 2/21/07, auto-sampler indicated that it was programmed to turn on at 0753, and took only 3 aliquots. Final sample (3<sup>rd</sup>) taken at 1031 ar
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  
CBOD5, TSS, NH3-N, Nitrate + Nitrite Nitrogen, FCB, & Total P samples were not taken 3 times/week in 2 instances.
6. SAMPLE COLLECTION PROCEDURES ADEQUATE  Y  N  NA
- a) SAMPLES REFRIGERATED DURING COMPOSITING. Temperature in auto-sampler (ISCO 6712CR) was 5 degrees C.  Y  N  NA
- b) PROPER PRESERVATION TECHNIQUES USED. Temperature listed on several COCs listed as above 4 degrees C when received by lab.  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 60 degree V-notch weir
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 ( 11/10/05 )  Y  N  NA  
 RECORDS MAINTAINED OF CALIBRATION PROCEDURES.  Y  N  NA  
 CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE. Done once/month, but % error calculated incorrectly.  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 10\_ % OF THE TIME  Y  N  NA
- 6. SPIKED SAMPLES ARE ANALYZED 10\_ % OF THE TIME.  Y  N  NA
- 7. COMMERCIAL LABORATORY USED.  Y  N  NA

LAB NAME Environmental Testing Group Pace Analytical  
 LAB ADDRESS 1702 East Central, P.O. Box 507, Bentonville, AR 72712 9608 Loiret Blvd., Lenexa, KS 66212  
 PARAMETERS PERFORMED CBOD5, TSS, Nitrate + Nitrite Nitrogen, Ammonia Nitrogen, Total Phosphorous, FCB Biomonitoring

**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	Apparent leak from wastewater lagoon former outfall.

Comments: Slight algae at discharge point.

**SECTION H - SLUDGE DISPOSAL**

SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS.  S  M  U  NA (FURTHER EXPLANATION ATTACHED No).  
 DETAILS: Sludge is disposed of by American Disposal at Prairie View Landfill in Lamar, Missouri.

- 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: N/A (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 2/21/07 Time 11:32 am

Head in Inches 16.5" = 1.375'

Type & Size of Primary Flow Measurement Device

60 Degree V-Notch Weir

Name & Model of Secondary Flow Measurement Device

ISCO 4210 Ultrasonic Flow Meter

Recorded Flow at date & time listed above 1392 gpm

Flows are calculated from flow charts taken from the **ISCO Open Channel Flow Measurement Handbook-5th Edition**

$$\% \text{ error} = \frac{(1392 \text{ gpm} - 1436 \text{ gpm})}{1436 \text{ gpm}} \times 100$$

$$\% \text{ error} = \underline{-0.0306} \times 100$$

$$\% \text{ error} = -3.06 \%$$

## DMR Calculation Check

Reporting Period: From 06 11 01 To 06 11 30  
 Year Month Day Year Month Day

Parameter Checked: CBOD5

	Loading Mass Mo. Avg. -lbs/ day	Concentration Monthly	
		Mo. Avg.-mg/l	7-day Avg. -mg/l
Reported Value:	131.1	7.65	11
Calculated Value:	131.1	7.91	11
Permit Value:	133.4	10	15

If calculated value does not equal reported value, explain:

Monthly average has been calculated simply as an arithmetic average of concentrations for the calendar month. The Decatur POTW permit defines the Monthly Average (see Daily Average definition) as the arithmetic average (weighted by flow) of all “daily discharges” of concentration determined during the calendar month where C = daily concentration, F = daily flow and n = number of daily samples.

Therefore, the monthly average discharge =  $\frac{C_1F_1 + C_2F_2 + \dots + C_nF_n}{F_1 + F_2 + \dots + F_n}$

# ADEQ

ARKANSAS  
Department of Environmental Quality

March 16, 2007

Mr. James Boston, Public Works Director  
City of Decatur  
P.O. Box 247  
Decatur, Arkansas 72722

RE: AFIN: 04-00052

NPDES Permit No.: AR0022292

Dear Mr. Boston:

On February 21, 2007, Alison West, District Field Inspector, and I performed a routine compliance inspection of the waste water treatment facility in accordance with the provisions of the federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, and the regulations promulgated there under. This inspection revealed the following violations:

1. Monthly averages (mg/L) for CBOD5, TSS, Ammonia-Nitrogen, and Total Phosphorus are calculated simply as arithmetic averages. Your permit requires that monthly averages be flow-weighted. Refer to Daily Average (or Monthly Average) in Part IV, Section A of your permit for the appropriate formula for this calculation.
2. Part 1, Section A of your permit requires that all effluent characteristics, excluding flow, be monitored at a frequency of 3 times/week. Records for November 2006 through January 2007 indicate that only two sampling events occurred during the week of 11/26/06 – 12/02/06 for the vast majority of the parameters required to be monitored by your permit. During this period, only TRC and pH were monitored at the frequency required by the permit. In addition, during the week of 01/14/07 – 01/20/07, only one sampling event occurred for the vast majority of the parameters required to be monitored by your permit. During this period, TRC and pH were monitored only twice.
3. Several excursions of your permit effluent limits occurred during the months of October 2006 through January 2007. In addition to reviewing Discharge Monitoring Reports (DMRs) for October 2006 through December 2006, your DMR Calculating Spreadsheets for November 2006 through January 2007 were reviewed:
  - Nitrate + Nitrite-Nitrogen: The instantaneous maximum limits were exceeded one time in October 2006, four times in November 2006, five times in December 2006, and three times in January 2007. In addition, your DMR indicates only three excursions for November 2006.

WATER DIVISION

- Fecal Coliform Bacteria: 7-day geometric mean limits were exceeded once in December 2006 and once in January 2007. Your DMR calculating spreadsheet for January 2007 indicates the maximum 7-day geometric mean as 26 col/100 ml. The DMR for January 2007 was not available for review, but the maximum 7-day geometric mean should have been reported as 7900 col/100 ml. Only one sample was taken during that week (01/14/07 – 01/20/07). Refer to the definition of 7-day average for fecal coliform in your permit.
  - Total Suspended Solids: The monthly average limits for mass (lbs/day) were exceeded in November 2006. In addition, the monthly average limit (mg/L) and 7-day average limit (mg/L) were exceeded in January 2007. Your DMR Calculating Spreadsheet for January 2007 listed the maximum 7-day average as 20.67 mg/L. The DMR for January 2007 was not available for review, but the value should have been reported as 68.00 mg/L. Only one sample was taken during that week (01/14/07 – 01/20/07). Refer to the definition of 7-day average in your permit.
  - Carbonaceous Biochemical Oxygen Demand: The 7-day average was exceeded in January 2007. Your DMR calculating spreadsheet for January 2007 listed the maximum 7-day average as 16 mg/L. The DMR for January was not available for review, but the value should have been reported as 37 mg/L. Only one sample was taken during that week (01/14/07 – 01/20/07).
4. On the date of the inspection, the ISCO 6712SR sampler indicated that it was programmed to turn on at 7:53 am. Only three aliquots were taken before the sampler shut off for the day. Aliquots were taken at 8:08 am, 9:19 am, and the final sample was taken at 10:31 am. This is in violation of the requirements for a 6-hour composite sample as defined in Part IV, Section A of your permit. A 6-hour composite sample must consist of six effluent portions collected no closer together than one hour (with the first portion collected no earlier than 10:00 am) and composited according to flow.
  5. The temperature in the ISCO 6712SR sampler was at 5 degrees C at the time of the inspection. The temperature must not exceed 4 degrees C. This is in violation of Part II, Section C of your permit.
  6. The ISCO 6712SR sampler was calibrated last in November 2005. This calibration is required annually.
  7. Flow calibration checks were conducted once/month, but not according to the definition of percent error.



8. At the time of the inspection, the treatment facility did not have an alternate power source and alarm system for power or equipment failures. This is in violation of Part 2, Section B of the permit. This is a repeat violation.
9. The November 2006, Chain of Custody (COC) reports for Environmental Testing Group, Inc. (ETG) were reviewed and were not properly completed when more than one parameter was listed. The COC should reflect the proper sample type (grab vs. composite) and appropriate preservation method used for each of the required parameters. If different parameters require different sample types and different preservation methods, they should be listed on separate rows on the COC. On one line, the COC shows composite sample; water as matrix; and sulfuric acid, ice, and non-preserved as preservation types for CBOD, TSS, ammonia-nitrogen, TP, and nitrate-N. This is a repeat violation.
10. The "Remarks" section on the COCs for samples received or picked up by ETG on the dates of November 2<sup>nd</sup>, 8<sup>th</sup>, 15<sup>th</sup>, 16<sup>th</sup> and 21<sup>st</sup> 2006 list temperatures in excess of 4 degrees C when picked up or received. This is in violation of Part II, Section C of your permit.
11. There is evidence of a periodic leak from what was described as a former discharge point from your waste lagoon into Columbia Hollow Creek. It appears that during times of high water levels in the lagoon, wastewater from the lagoon is seeping through a discharge culvert thought to have been adequately sealed. This must be investigated as soon as possible.
12. There are no records of a description of a storm water discharge employee training program for the facility. This is in violation of Part III, Section 10 of your permit.

The above items require your immediate attention. Please submit a written response to these findings to the NPDES Enforcement Section of this Department when the violations have been corrected. This response should contain documentation describing the course of action taken to correct the items noted. This corrective action should be completed as soon as possible, and the written response is due by April 6, 2007.

Page 4  
City of Decatur  
March 16, 2007

If I can be any assistance, please contact me at 479-267-0816.



Sincerely,

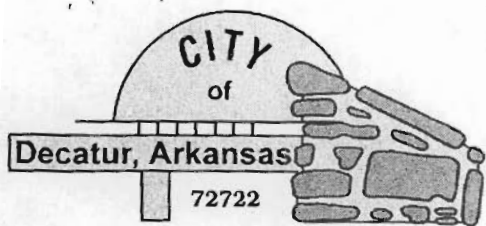
A handwritten signature in black ink, appearing to read "John Fazio". The signature is written in a cursive style with a large, stylized "J" and "F".

John Fazio  
District Field Inspector  
Water Division

cc: NPDES Enforcement Branch  
NPDES Permits Branch

**Arkansas Department of Environmental Quality (ADEQ)  
Official Photograph Sheet**

<b>Location:</b>		City of Decatur POTW						
<b>Photographer:</b>		John Fazio			<b>Witness:</b>		Alison West	
<b>Photo #</b>	1	<b>Of</b>	2		<b>Date:</b>	02/21/07	<b>Time:</b>	1114
<b>Description:</b>								
<p>MVC-011F: Apparent leak from wastewater lagoon. This drains into Colombia Hollow Creek. This culvert was described as a former outfall, and was thought to have been adequately sealed at the drop inlet. Evidence of flow from outlet is visible in foreground, as well as apparent accumulation of sludge. Columbia Hollow Creek is immediately behind photographer.</p>								
<b>Photographer:</b>		John Fazio			<b>Witness:</b>		Alison West	
<b>Photo #</b>	2	<b>Of</b>	2		<b>Date:</b>	02/21/07	<b>Time:</b>	1116
<b>Description:</b>		MVC-012F: Drop inlet at waste lagoon. When wastewater levels are high, it appears that wastewater is flowing into inlet. Concrete seal designed prevent discharge appears to be leaking.						
								



PDS Insp.  
# 031199

POST  
NOV 07 2007  
MARKED  
310 Maple Avenue • Box 247  
Phone: (479) 752-3912

April 27, 2007

-SL to Frank

Dennis Benson  
Enforcement Chief ADEQ  
8001 National Drive  
Little Rock AR 72209

RE: Compliance Inspection Report 2006-2007 for Permit Number AR0022292.

Dear Mr. Benson,

This letter is the follow up letter to the inspection report that was conducted by Mr. John Fazio and Ms. Alison West. I am responding to the items below in the order they were listed on the report...

1. The first item dealt with us simply calculating our monthly average for our CBOD5, TSS, Ammonia -Nitrogen, and Total Phosphorus arithmetically and not flow weighted. We use two programs to check our monthly lab numbers and data, from these results we do not see that this is not the way it is being done. We will continue to check to see if these numbers done by hand and by our calculating programs are the same and consistent.

2. The violation of not sampling for the two date periods mentioned was for severe weather reasons. Both of these events were caused by roads that were hazardous to lab personnel and my personnel, schools and many businesses were closed, we were called on both occasions and told lab service was not possible. The reason the pH and TRC were done and not the rest of the test is these are in house test we perform. During the January 2007 event not even my Lab man was able to get to work to perform the daily TRC and pH due to the severe ice storm. Our testing lab is approximately 25 miles form our WWTP. There were no intentional reasons for not testing; just weather that was far from the normal.

3. This was the largest of the inspection comments. Most of the items have been answered throughout the report with a few exceptions. One is the inspector says in all of the violation areas that the January report was not available, he must have meant the February report was not completed. The January report was done and available, the February report was not due but since it was not signed yet he did not want to review it at that time.

It is true that we did have problems with some of our permit limits during the months pulled for the inspection report. Nitrates have been something that we have been fighting for the past year. This year with better mixing in our aeration basin we have made great improvements with no violations in March. Some of the numbers the inspector came up with on the TSS and CBOD5 calculations do not match what our lab numbers and calculators come up with. I respectfully request guidance in seeing how these numbers were derived.

Nobody is more excited than us to get approval and building of our new WWTP to address our compliance problems. We are asking our WWTP to do things it was not designed to do. We have made many improvements to try and maintain compliance with our permit limits. Phosphorus was a success for us with a 1.0 mg/l limit and an actual yearly average last year of less than 0.5 mg/l. Our old plant has had its problems during cold weather months but with promising nitrate numbers so for this year we will do everything we can to keep it in compliance.

4. This point dealt with sampling. We have had problems with our sampler not sampling during the sample hours programmed into the sampler. Like I have discussed in the past it is hard to get qualified people to work on this equipment. I am confident that the ISCO personnel that are to be here in May 2007 will get this problem fixed for the long term.

5. The temperature in the sampler will be monitored closer before and during the monitoring days in the future to maintain the correct temperature.

6. It was my understanding that I had to calibrate once per fiscal year, I now understand it to be once per calendar year.

7. Flow calibration checks have been done and the ISCO flow meter has been the most accurate flow monitor we have ever had, consistently 3% or less error. The inspector I believe talked a little over my operator's normal understanding and thus caused him to say more than he understood. The formula the inspector used on his inspection is the only one now used on the monthly checks.

8. Back up power has been designed into the new treatment plant that is to come on line. ADEQ has been reviewing the new plant design since last August. We are hoping for an up or down answer on the plant design any day now. The plant is checked daily, and installing a backup power system to finish up the present plants life would be cost prohibitive for us.

9. I will do the best I can to explain the chain of custody problem. Our lab Environmental Testing Group seems to have two sets of people to satisfy as to what should be on the COC. They say the chain has everything and in the form that all their State Regulators require. I have told them that this is fine but I am still getting written up from you. They are in the process of making up a new chain just for us that I will send to you for review as soon as it is in my hands. I am sorry for this continuing problem.

10. We take our samples to the lab ourselves one day a week. After looking at the dates the samples were out of range it is apparent that this is only happening on the day we take the samples to the lab. Our courier often has other stops to make, so setting in a cooler in a hot truck has to be the problem. We will ice the samples better when being transported to overcome the travel problem.

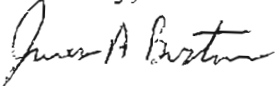
11. The inspector was concerned about a possible leak at a former discharge point of our sludge holding basin. This drain has been filled with concrete, and the operator is

required to check this site weekly to make sure no water or sludge seeps around the drain area. At which time corrective action will be taken.

12. Storm water training will begin this year and documented. I could not find the requirement in my permit under part III section 10 but I now understand that it needs to be done anyway.

If you have any questions or concerns on any of the responses for the inspection problems please contact me at (479) 752-7229.

Cordially,



James A Boston  
Public Works Manager

PDS Insp. # 036588

POST

NOV 08 2007

MARKED

-SL to Frank



November 8, 2007

NPDES Enforcement Section  
Water Division  
Arkansas Department of Environmental Quality  
5301 Northshore Drive  
North Little Rock, AR 72118-5317

Re: Permit AR0046663  
Air Liquide Blytheville Facility  
Response to NPDES Compliance Inspection Report  
AFIN: 47-0241

Dear Sir or Madam:

Air Liquide acknowledges receipt of the NPDES Compliance Inspection Report dated October 24, 2007 for the Blytheville Facility located at 4326 N. County Rd. 919, Armored, Arkansas and provides the following response to items as noted in the report.

1. The monthly average for loading is being calculated using the maximum flow recorded each month instead of flow on the day of sample collection.

**Response:** This was reviewed with the inspector on the day of the inspection. The facility has already corrected the loading calculation to use the flow on the day of sample collection and will be reflected in the next sampling event.

2. Currently the samples being collected for biomonitoring are not being proportioned according to flow; .....

**Response:** The facility has purchased and installed a device that is directly connected to the automatic sampler. This device communicates with the meter and sends a signal to the sampler so that a 24-hour composite sample that is proportioned according to flow is collected. Effective with the next sampling event and thereafter, the facility, as required by Part I, Section A of the permit, will collect a 24-hour composite sample in accordance with Definition 20, Part IV of the permit.

3. There was an accumulation of Perlite on the walls of the effluent pump station; .....

**Response:** At the time of the inspection, the facility was undergoing maintenance and cleanout of the cold box which contains a lightweight insulation material (perlite). This is not a routine activity and in fact occurs once every 5 years. A small amount of this material inadvertently accumulated on the walls of the effluent pump

Water Division Enforcement Section  
November 8, 2007  
Page 2

station. To ensure that this doesn't happen again, we will provide additional training for proper handling and containment of perlite during maintenance activities.

If you have any questions, please contact me at 870-763-2500.

Regards,



Tim Martin  
Plant Manager