



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Washington, D.C. 20460

# NPDES Compliance Inspection Report

Form Approved  
OMB No. 2040-0003  
Approval Expires 7-31-85

## Section A: National Data System Coding

Transaction Code	NPDES	yr/mo/day	Inspec. Type	Inspector	Fac Type
1 <b>N</b> 2 <b>5</b> 3 <b>A R 0 0 2 2 4 0 3</b> 11 12 <b>0 7 0 4 0 5</b> 17 18 <b>C</b> 19 <b>S</b> 20 <b>1</b>					
Remarks					
<b>A F I N 0 4 - 0 0 1 5 4</b>					
Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
67 <input type="text"/> <input type="text"/> <input type="text"/> 69	70 <b>3</b>	71 <b>N</b>	72 <b>N</b>	73 <input type="text"/> <input type="text"/> <input type="text"/>	74 75 <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/>

## Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) City of Bentonville Wastewater Treatment Plant 1901 NE A Street Bentonville, AR 72712	Entry Time /Date <b>0925/04-05-07</b>	Permit Effective Date <b>01-01-04</b>
	Exit Time/Date <b>1445/04-05-07</b>	Permit Expiration Date <b>12-31-08</b>
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Leon Leonard/Wastewater Utility Foreman/479-271-3160/479-271-3163 Nancy Busen/Lab Supervisor and Pretreatment Coordinator/479-271-3160/479-271-3163	Other Facility Data  Outfall OO1: N 36.39234 W -94.20352  Entrance: N 36.39100 W -94.20383	
Name, Address of Responsible Official/Title/Phone and Fax Number Belva Plumlee/Wastewater Utility Manager/479-271-3160/479-271-3163 City of Bentonville 115 W. Central Bentonville, AR 72712	Contacted Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	

## Section C: Areas Evaluated During Inspection

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

<b>S</b> Permit	<b>U</b> Flow Measurement	<b>S</b> Operations & Maintenance	<b>S</b> Sampling
<b>S</b> Records/Reports	<b>M</b> Self-Monitoring Program	<b>S</b> Sludge Handling/Disposal	<b>S</b> Pollution Prevention
<b>S</b> Facility Site Review	<b>S</b> Compliance Schedules	<b>N</b> Pretreatment	<b>N</b> Multimedia
<b>M</b> Effluent/Receiving Waters	<b>S</b> Laboratory	<b>N</b> Storm Water	<b>S</b> Other: 2006 Annual Report for Land Application of Biosolids

## Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

Records reviewed include DMRs and DMR calculating spreadsheets for July, August & September 2006, lab analysis and chain-of-custody reports for August 2006, 3<sup>rd</sup> Quarter 2006 Biomonitoring results, Table II and Table III toxic pollutant monitoring results for 2006, and the 2006 Land Application of Biosolids Report.

No final effluent limit excursions were noted for these months.

Name(s) and Signature(s) of Inspector(s) <b>John Fazio</b>	Agency/Office/Telephone/Fax Arkansas Dept. of Environmental Quality/ Fayetteville/479-267-0816/479-267-0819	Date <b>04/09/07</b>
Alison West		
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date

**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  NA
- 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. City has provided dual feed for power.  S  M  U  NA
- 4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE. SCADA-battery backup  S  M  U  NA
- 5. ALL NEEDED TREATMENT UNITS IN SERVICE.  S  M  U  NA
- 6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED. 32 Operators: 4-Class IV, 2-Class III, remaining are Class II & I  S  M  U  NA
- 7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED. (Non 92-500)  S  M  U  NA
- 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  NA

**SECTION C - OPERATIONS AND MAINTENANCE (CONT'D)**

9. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR? In collection system  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?  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. **24 hour composite/flow weighted**  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 Yes ).  
 DETAILS:

1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED.  Y  N  NA  
 TYPE OF DEVICE 24" Parshall Flume

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 (for secondary flow measurement device). (DATE OF LAST CALIBRATION (10-11-04))  Y  N  NA  
 RECORDS MAINTAINED OF CALIBRATION PROCEDURES.  Y  N  NA  
 CALIBRATION CHECKS (% error) DONE TO ASSURE CONTINUED COMPLIANCE. Twice/month, but method to assure compliance improper.  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.  Y  N  NA

LAB NAME American Interplex Wilkens Environmental  
 LAB ADDRESS 8600 Kanis Road, Little Rock, AR 72204 P.O. Box 2317, Stillwater, OK 74076  
 PARAMETERS PERFORMED Table II Organics, Table III metals, TCLP, PCB 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
<b>001</b>	<b>None</b>	<b>None</b>	<b>None</b>	<b>Trace</b>	<b>None</b>	<b>Clear</b>	<b>Algae</b>

Comments: Algae growth observed at and downstream from Outfall 001.

**SECTION H - SLUDGE DISPOSAL**

SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS.  S  M  U  NA (FURTHER EXPLANATION ATTACHED No).  
 DETAILS: Sludge is land applied to agricultural sites and composted.

- 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: Agriculture (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 04/05/07 Time 11:09 a.m.

Head in Inches 9.25" = 0.77 ft

Type & Size of Primary Flow Measurement Device

24" Parshall Flume

Name & Model of Secondary Flow Measurement Device

ISCO 3010 Ultrasonic Flow Meter

Recorded Flow at date & time listed above 2381 GPM

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

$$\% \text{ error} = \frac{(2381 - 2394)}{2394} \times 100$$

$$\% \text{ error} = \underline{-0.0054} \times 100$$

$$\% \text{ error} = \underline{-0.54 \%} \text{ (less than 10 \%)}$$

DMR Calculation Check

Reporting Period: From 06 08 01 to 06 08 31  
Year Month Day Year Month Day

Parameter Checked: CBOD5

	Loading	Concentration	
	Mass	Monthly	7-day Avg.
	Mo. Avg. -lbs/ day	Mo. Avg.-mg/l	-mg/l
Reported Value:	91	2.7	2.9
Calculated Value:	91	2.7	2.9
Permit Value:	334	10	15

If calculated value does not equal reported value, explain:

NPDES Compliance Inspection Report  
Further Explanation

Page 3 of 4

Section E

Detail 2

Percent error calculation improperly applied. Rather than using the **flow rate** for comparing primary and secondary flow measurement device results, recorded and measured **head** was used in the percent error formula.

For a 2 ft. Parshall Flume,  $GPM = 3590 H^{1.550}$ , where H = head in feet.

As such, recorded and calculated flow must be used in the % error formula:

$$\frac{R - C}{C} \times 100,$$

where R = recorded flow from flow meter, and C = calculated flow (converted from head in feet using formula above or Isco Open Channel Flow Measurement Handbook).

Please note that head to flow rate conversion formulas vary, depending on whether flow rate is measured in CFS, GPM or MGD, and whether head is measured in feet or meters.

Page 3 of 4

Section E

Detail 4

Secondary flow measurement device has not been calibrated since 10/11/04. It is recommended that this device be calibrated annually.

# ADEQ

ARKANSAS  
Department of Environmental Quality

April 13, 2007

Belva Plumlee, Wastewater Utility Manager  
1901 N.E. A Street  
Bentonville, Arkansas 72712

RE: AFIN: 04-00154

NPDES Permit No.: AR0022403

Dear Ms. Plumlee:

On April 5, 2007, Alison West, District Field Inspector, and I performed a routine compliance inspection of the Bentonville 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 violation:

- Flow meter accuracy check improperly calculated. Rather than using the recorded and calculated flow rates in the percent error formula, recorded and measured head were used to attempt to measure flow meter accuracy. This is in violation of Part II.C.2 of your permit. For a 2 ft. Parshall Flume,  $GPM = 3590 H^{1.550}$ , where H = head in feet (note that the conversion formula varies depending on the units chosen for measurement). As such, recorded and calculated flow must be used in the percent error formula to ensure that the device is capable of measuring flows with a maximum deviation of less than +/- 10 % from true discharge rates.

The above item requires your immediate attention. Please submit a written response to this finding to the Enforcement Branch of the Water Division when the violation has been corrected. This response should contain documentation describing the course of action taken to correct the item noted. This corrective action should be completed as soon as possible, and the written response is due by May 2, 2007.

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

Sincerely,



John Fazio  
District Field Inspector  
Water Division

cc: Enforcement Branch  
Permit Branch