

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: *Analytical results are inconsistent with data reported on March 2007 DMR.* S M U NA (FURTHER EXPLANATION ATTACHED No)

- 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. **Municipal Lab** 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. 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. **2 Class II, 7 Class 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

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: *Calibration checks are not being conducted.*

1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED. Y N NA
 TYPE OF DEVICE Rectangular Weir w/o end contractions

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 (2/05/07)) 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. *No Flow* 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. 0 % OF THE TIME **Municipal Laboratory (no duplicates recorded)** Y N NA
6. SPIKED SAMPLES ARE ANALYZED. 0 % OF THE TIME. **Municipal Laboratory (no spikes recorded)** Y N NA
7. COMMERCIAL LABORATORY USED. **BOD 5-Day** Y N NA

LAB NAME American Interplex Laboratories
 LAB ADDRESS 8600 Kanis Road, Little Rock, Ark.
 PARAMETERS PERFORMED BOD 5-Day

SECTION G - (EFFLUENT)/RECEIVING WATERS OBSERVATIONS. S M U NA (FURTHER EXPLANATION ATTACHED _____).

Based on visual observations only.

OUTFALL NO.	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOAT SOL.	COLOR	OTHER
001							

Comments: **No Discharge**

SECTION H - SLUDGE DISPOSAL

SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS. S M U NA (FURTHER EXPLANATION ATTACHED **No**).
 DETAILS: **Lagoon System, No sludge disposal at this time.**

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: _____ (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

- *A flow calculation check was not conducted do to a lack of discharge.*

FLOW CALCULATION SHEET

Field Data: Date _ Time

Head in Inches _____ = _____

Type & Size of Primary Flow Measurement Device

4'4" Rectangular Weir w/o contractions

Name & Model of Secondary Flow Measurement Device

Milltronics Hydro Ranger Open Channel Flow Meter

Recorded Flow at date & time listed above _____

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

% error = $\frac{(\text{recorded value} - \text{calculated value})}{\text{calculated value}} \times 100$

% error = _____ x 100

% error =

DMR Calculation Check

Reporting Period: From 2007 03 01 To 2007 03 31
Year Month Day Year Month Day

Parameter Checked: *Fecal Coliform*

	Loading Mass Mo. Avg. -lbs/ day	Concentration Monthly Mo. Avg.-mg/l 7-day Avg. -mg/l	
Reported Value:	<i>NA</i>	182	200
Calculated Value:	<i>NA</i>	181	193
Permit Value:	<i>NA</i>	1000	2000

If calculated value does not equal reported value, explain: *NOT EQUAL*

ADEQ

ARKANSAS
Department of Environmental Quality

May 23, 2007

Terry McGinister, General Manager
City of Helena Water and Sewer
702 Cherry Street
Helena, Arkansas 72342

RE: AFIN: 54-00083 NPDES Permit No.: AR0043389

Dear Mr. McGinister:

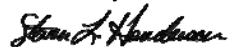
On May 17, 2007, I conduct a routine compliance inspection of the waste water treatment facility in accordance with the provisions of the federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, and the regulations promulgated thereunder. This inspection revealed the following violations:

- 1. Inadequate quality control procedures. Inadequate documentation, by municipal laboratory, that spike or duplicate samples are being utilized.**
- 2. The latest documentation of the 30-day average percent removal of Biochemical Oxygen Demand revealed a sixty-two percent (62%) removal rate. The current permit requires at least eighty-five percent (85%).**
- 3. No documentation of flow meter calibration checks being conducted to assure accuracy.**
- 4. Inadequate calculation of the analytical data reported on the Discharge Monitoring Report for Fecal Coliform Bacteria, BOD, and Total Suspended Solids in the month of March 2007.**

The above items require your immediate attention. Please submit a written response to the 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 **June 22, 2007**.

If I can be any assistance, please contact me at 870-673-8846.

Sincerely,



Steven L. Henderson
District 6 Inspector
Water Division

cc: Enforcement Branch

-SL to Frank

Helena Municipal Water & Sewer

702 Cherry Street
Helena-West Helena, Arkansas 72342

Owned and operated by the
City of Helena-West Helena

870-338-7438 Fax 870-338-7477

POST
JUN 20 2007
MARKED

June 19, 2007

A D E Q
Enforcement Branch
P.O. Box 8913
Little Rock, AR 72219-8913

Re: AFIN: 54-00083 NPDES Permit No. AR0043389

Dear Sir:

In reference to routine compliance inspection of May 17, 2007, we have made the following corrections:

Item 1 - This problem occurred while our employee was on vacation. We have cross-trained an additional employee to run a spike or duplicate sample.

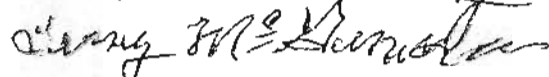
Item 2 - We have increased the detention time on the sewer ponds by cutting back on the flow. This allows for more oxidation time and settlement of waste material.

Item 3 - We had a problem calibrating the flow meter and in turn have requested for Instrument & Supply to re-calibrate the flow meter and review calibration procedure with our employees. The sewer pond levels are too low to flow at this time.

Item 4 - We have recalculated and corrected the analytical data reported on the March 2007 (DMR), corrected copy attached.

Please advise if additional information is required.

Sincerely,



Terry McGinister
General Manager

cc: Steven L. Henderson
District 6 Inspector