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

NPDES Compliance Inspection Report

Section A: National Data System Coding

1	Transaction Code	2	NPDES	11	12	yr/mo/day	17	18	Inspec. Type	19	Inspector	20	Fac Type
	N	5	ARG022187			070522			C		T		1

Remarks: AFIN 36-00038

Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved
67–69	70: 5	71: N	72: N	73–80

Section B: Facility Data

Name and Location of Facility Inspected *(For industrial users discharging to POTW, also include POTW name and NPDES permit number)*
Clarksville Light and Water Pollution Control Facility
Located on South Crawford Highway one mile South of Interstate 40 Exit 57 in Sections 7 & 8, Township 9 North, Range 23 West, in Johnson County, Arkansas

Entry Time /Date: 0830 / May 22, 2007
Exit Time/Date: 1445 / May 22, 2007

Permit Effective Date: January 1, 2004
Permit Expiration Date: December 31, 2008

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)
Mr. Gregg Rainey / Pollution Control Facility Superintendent / Phone: 479-754-7929 / Fax: 479-754-6885

Name, Address of Responsible Official/Title/Phone and Fax Number
Mr. Hugh W. Harrison, III, General Manager
Clarksville Light and Water Co.
P.O. Box 1807
Clarksville, AR 72830 / Phone 479-754-6241

Contacted: Yes [ ] No [X]

Other Facility Data
Outfall OO1 sample point located at
Latitude N 35-26-38.8
Longitude W 93-29-05.4
Outfall 002 sample point located at
Latitude N 35-26-44.3
Longitude W 93-28-24.8

Section C: Areas Evaluated During Inspection

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

S	Permit	S	Flow Measurement	S	Operations & Maintenance	S	Sampling
S	Records/Reports	S	Self-Monitoring Program	S	Sludge Handling/Disposal	N	Pollution Prevention
S	Facility Site Review	S	Compliance Schedules	N	Pretreatment	N	Multimedia
S	Effluent/Receiving Waters	S	Laboratory	N	Storm Water	S	Other: Effluent Limits

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

During the course of this inspection, Discharge Monitoring reports from May 2006 through April 2007 were reviewed. No numeric effluent violations were reported during this period. The facility reported a Lethal/Sublethal Effects Biomonitoring test failure in February 2007. Test failure was attributed to cold water pathogenic fungus. The ADEQ Water Division did not require a retest. The plant was found to be operated and maintained well.

The Allen Gilliam and the Massengale Lift stations were inspected. Both lift stations were found to be in good working condition with standby pumps, audible/visible alarms and call boxes to the utility (calls monitored 24/7).

Section D is continued on Attachment #4 of this report.

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Telephone/Fax	Date
Bruce Kirkpatrick	Arkansas Dept. of Environmental Quality / Jasper Field Office / 870-446-6170 / 870-446-218	June 15, 2007
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date

EPA Form 3560-3 (Rev. 9-94) Previous editions are obsolete.

PERMIT NO.: **AR0022187**

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: See Section D: Summary of Findings and Comments beginning on Page 1 and continued on Attachment #4 of this report for 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.	■ 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: Facility has 3 backup generators: one at the plant, one at the main lift station and a portable unit for lift stations.

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.	■ 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

PERMIT NO.: **AR0022187**

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 SELF-MONITORING 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:

1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED. ■ Y □ N □ NA
TYPE OF DEVICE Ultrasonic meter in 24" pipe at Outfall 001, 90 degree V-notch weir at Outfall 002

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 5, 2006, annual calibration set for May**) ■ 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: See Section D: Summary of Findings and Comments beginning on Page 1andcontinued on Attachment #4 of this report for details.

1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(b) FOR SLUDGES) (See Attachment #4) ■ Y □ N □ NA

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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 CHEMLAB EEG
LAB ADDRESS 4302 Wheeler Avenue, Ft. Smith, AR 72901 220 N Knoxville, Russellville 72801
PARAMETERS PERFORMED Total Zinc, Selenium and Mercury Biomomitoring

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							
002							

Comments: No discharge at Outfall 002. Outfall 001 could not be observed without a boat due to high waters from Arkansas River.

SECTION H - SLUDGE DISPOSAL

SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS. ■ S ☐ M ☐ U ☐ NA (FURTHER EXPLANATION ATTACHED **No**).
DETAILS: See Section D: Summary of Findings and Comments beginning on Page 1 and continued on Attachment #4 and Attachment #3 of this report for details.

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: Agricultural (e.g., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE)

SECTION I - SAMPLING INSPECTION PROCEDURES ■ S ☐ M ☐ U ☐ NA (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 **05/22/07** Time **1303**

Head in Inches **N/A** = **N/A**

Type & Size of Primary Flow Measurement Device
Ultrasonic meter in 24" pipe
Name & Model of Secondary Flow Measurement Device
BIF Model 0259-21

Recorded Flow at date & time listed above **0.99 MGD**

Due to type and location of meter, no flow calibration check was performed.

DMR Calculation Check

Reporting Period: From 07 02 01 To 07 02 28

Year Month Day Year Month Day

Parameter Checked: Carbonaceous Biochemical Oxygen Demand (CBOD5)

	Mass Loading	Concentration	
	Mo. Avg. -lbs/ day	Mo. Avg.-mg/l	7-day Avg. -mg/l
Reported Value:	**33.16**	**3.54**	**5.23**
Calculated Value:	**33.2**	**3.54**	**5.23**
Permit Value:	**167**	**10**	**15**

Calculations performed using computer spreadsheet. Calculated values equal reported values.

If calculated value does not equal reported value, explain: n/a

503 SLUDGE INSPECTION CHECKLIST - LAND APPLICATION

FACILITY: City of Clarksville
PERMIT #: AR0022187
INSPECTION DATE: May 22, 2007

1. What is the quantity of sludge land applied per year (dry weight basis) **139 metric tons in 2006** -
2. What is the required frequency of monitoring for pollutants, pathogen densities, and vector attraction reduction? (See table 2-7, p. 43) Annualy
3. Is monitoring being conducted at the required frequency? Yes

4. Which set of metals limits is being met? (pollutant concentration limits or ceiling concentration limits - See Table 2-1, p. 29) Pollutant **concentration limits**
5. Which Pathogen Reduction Requirement alternative is being used? (See Table 2-5., p. 37)
   Alternative 2
   Are the requirements for the alternative being met? **Yes**
6. Which Vector Attraction Reduction option is being used? (See Table 2-6, p. 37)
   Specific Oxygen Uptake Rate Test
   Are the requirements for the selected option being met? **Yes**

GO TO FLOW CHART, DETERMINE SLUDGE TYPE, RESULTING REQUIREMENTS

7. What is the sludge type? (EQ, PC, CPLR, or APLR) **PC**
8. Are site restrictions required? **Yes**

   Are they being met? (See Fig. 2-4, p. 38) **Yes**

9. Are management practices required? **Yes**

   Are they being met? (See Fig. 2-9, p. 45) **Yes**
10. Do the general requirements apply? **Yes**
    Are they being met? (See Fig. 2-8, p. 44) **Yes**
11. Is the facility subject to loading rate limits? **Yes**
    Are they being met? (See Table 2-1, p. 29) **Yes**

NOTE: TABLES AND PAGE NUMBERS REFERENCED ABOVE ARE FROM EPA'S A PLAIN ENGLISH GUIDE TO THE EPA PART 503 BIOSOLIDS RULE, September 1994.

SECTION D (Continued from Page 1)

The Donald Meeks sludge land application site was inspected. According to facility records, the most recent land application was on October 6, 2006. No evidence of violations was observed.

The facility has been experiencing problems treating the pre-treated effluent from the Sara Lee – Hanes Brand industrial user. The facility is a hosiery manufacturer. A mineral oil from raw material is passing through the pretreatment system and accumulating in the POTW's treatment units. No effluent violations have occurred to date due to this problem, however potential violations are of concern. The industrial user signed a consent administrative order and has until November 15, 2007, to meet an Oil & Grease Pretreatment Limit of 100 mg/l.

The POTW experienced two overflows of the collection system in the last 12 months: one on 1/15/07 at Grandview Street and one late on 1/14/07 and early 0 1/15/07 on Taylor Street. Both were due to excessive rainfall. The POTW continues its annual program of smoke testing and repair of lines and manholes.

The following observations were made during the review of the POTW's laboratory and reports. (1) A review of lab records revealed problems with excessive BOD blank depletion (>0.2 mg/l). (2) The facility cited EPA Method 160.2 as the TSS test procedure. This method was rescinded by EPA on April 11, 2007. (3) Facility thermometers were not calibrated annually using an ANSI thermometer. (4) Facility was not performing an ammonia distillation comparative study once per year as required. (5) The facility was performing the Glucose Glumatic Acid Standard test once per month instead of each time BODs are run as required.

ADEQ

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

June 28, 2007

Mr. Hugh W. Harrison, III
General Manager
Clarksville Light and Water Company
P.O. Box 1807
Clarksville, AR 72830

Re: AFIN: 36-00038; NPDES Permit No. AR0022187

Dear Mr. Harrison:

On May 22, 2007, I performed a compliance evaluation inspection of your 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. I was accompanied by Mr. David Long, USEPA Region 6 Inspector, who was there for oversight. This inspection revealed that you are in compliance with the terms of your permit.

If I can be of any assistance, please contact me at 870-446-6170.

Sincerely,

Bruce Kirkpatrick
District Field Inspector
Water Division

cc: Water Division Enforcement Branch