ADEQ

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

November 16, 2007

Carl Wheatley, Water Manager
City of Malvern
P.O. Box 638
Malvern, Arkansas 72104

RE: AFIN: 30-00040 NPDES Permit No.: AR0034126

Dear Mr. Wheatley:

On November 9, 2007, 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 thereunder. **This inspection revealed that the 7 day average maximums were being incorrectly reported on the DMR's. You were reporting the average of the 7 day averages and not the maximum 7 day average.**

The above item requires your immediate attention. Please submit a written response to these findings to the Water Division Enforcement Section of this Department at the following address:

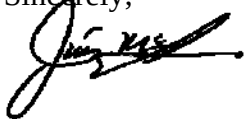
Water Division Enforcement Section
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317

This response should contain detailed 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 December 15, 2007.

For additional information you may contact the enforcement section by telephone at 501-682-0639 or by fax at 501-682-0910.

If I can be of any assistance, please contact me at 501-520-0541.

Sincerely,



Jim McSwain
District 7 Field Inspector
Water Division

cc: Water Division Enforcement Branch
Water Division Permits Branch

ADEQ Water NPDES Inspection	AFIN:	Permit #:

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

EPA

NPDES Compliance Inspection Report

Form Approved
OMB No. 2040-0003

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	AR0034126			071109			C		S		1

Remarks

AFIN# 30-00040 HOT SPRING CO.

67	Inspection Work Days	69	70	Facility Evaluation Rating	71	BI	72	QA	73	Reserved	74	75	Reserved	80
	1			4		N		N						

Section B: Facility Data

Name and Location of Facility Inspected *(For industrial users discharging to POTW, also include POTW name and NPDES permit number)*	Entry Time/Date	Permit Effective Date
City of Malvern Wastewater facility 1/2 mile Gribsy Ford Road	1350 on 11/09/07	June 1, 2005
	Exit Time/Date 1620 on 11/09/07	Permit Expiration Date May 31, 2010

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)	Other Facility Data
Carl Wheatley, Wastewater Supt., 501-337-9436 John Davis, Wastewater Plant Operator	

Name, Address of Responsible Official/Title/Phone and Fax Number	Contacted
Carl Wheatley, Water Mgr., 501-332-3634 P.O. Box 638 Malvern, AR 72104	Yes ☑ No ☐

Section C: Areas Evaluated During Inspection
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

S	Permit	S	Flow Measurement	S	Operations & Maintenance	N	Sampling
U	Records/Reports	S	Self-Monitoring Program	N	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	U	Other: DMR'S

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

Permittee is mistakenly reporting the average of all of the 7 day averages taken that month, instead of reporting the maximum of the 7 day averages for the month.

I checked thru several months of DMR's, the parameter was never exceeded as a result of these miscalculations.

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Telephone/Fax	Date
Jim McSwain	**AR Dept. of Environmental Quality – Hot Springs Field Office – 501-520-0541 – Fax 501-520-5978**	**11/16/07**
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date

ADEQ Water NPDES Inspection	AFIN:	Permit #:

SECTION A: PERMIT VERIFICATION	
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS	☑S ☐M ☐U ☐NA ☐NE
DETAILS:	
1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE:	☑Y ☐N ☐NA ☐NE
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES:	☑Y ☐N ☐NA ☐NE
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT:	☑Y ☐N ☐NA ☐NE
4. ALL DISCHARGES ARE PERMITTED:	☑Y ☐N ☐NA ☐NE
SECTION B: RECORDKEEPING AND REPORTING EVALUATION	
RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT	☐S ☐M ☑U ☐NA ☐NE
DETAILS:	
1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS:	☐Y ☑N ☐NA ☐NE
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE:	☑S ☐M ☐U ☐NA ☐NE
a. DATES AND TIME(S) OF SAMPLING:	☑Y ☐N ☐NA ☐NE
b. EXACT LOCATION(S) OF SAMPLING:	☑Y ☐N ☐NA ☐NE
c. NAME OF INDIVIDUAL PERFORMING SAMPLING:	☑Y ☐N ☐NA ☐NE
d. ANALYTICAL METHODS AND TECHNIQUES:	☑Y ☐N ☐NA ☐NE
e. RESULTS OF CALIBRATIONS:	☑Y ☐N ☐NA ☐NE
f. RESULTS OF ANALYSES:	☑Y ☐N ☐NA ☐NE
g. DATES AND TIMES OF ANALYSES:	☑Y ☐N ☐NA ☐NE
h. NAME OF PERSON(S) PERFORMING ANALYSES:	☑Y ☐N ☐NA ☐NE
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE:	☑S ☐M ☐U ☐NA ☐NE
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR:	☑S ☐M ☐U ☐NA ☐NE
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA:	☑Y ☐N ☐NA ☐NE
SECTION C: OPERATIONS AND MAINTENANCE	
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED	☑S ☐M ☐U ☐NA ☐NE
DETAILS:	
1. TREATMENT UNITS PROPERLY OPERATED:	☑S ☐M ☐U ☐NA ☐NE
2. TREATMENT UNITS PROPERLY MAINTAINED:	☑S ☐M ☐U ☐NA ☐NE
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED:	☐S ☐M ☐U ☑NA ☐NE
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE:	☑S ☐M ☐U ☐NA ☐NE
5. ALL NEEDED TREATMENT UNITS IN SERVICE:	☑S ☐M ☐U ☐NA ☐NE
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED:	☑S ☐M ☐U ☐NA ☐NE
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED:	☑S ☐M ☐U ☐NA ☐NE
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE:	☑Y ☐N ☐NA ☐NE
9. STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED:	☑Y ☐N ☐NA ☐NE
10. PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED:	☑Y ☐N ☐NA ☐NE
11. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR:	☑Y ☐N ☐NA ☐NE
12. IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED:	☑Y ☐N ☐NA ☐NE
13. HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS:	☑Y ☐N ☐NA ☐NE
14. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT:	☐Y ☑N ☐NA ☐NE
15. IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT:	☐Y ☐N ☑NA ☐NE

SECTION D: SAMPLING

PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS	☑S ☐M ☐U ☐NA ☐NE
DETAILS:	
1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT:	☑Y ☐N ☐NA ☐NE
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES:	☑Y ☐N ☐NA ☐NE
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT:	☑Y ☐N ☐NA ☐NE
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT:	☑Y ☐N ☐NA ☐NE
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT:	☑Y ☐N ☐NA ☐NE
6. SAMPLE COLLECTION PROCEDURES ADEQUATE:	☑Y ☐N ☐NA ☐NE
a. SAMPLES REFRIGERATED DURING COMPOSITING:	☑Y ☐N ☐NA ☐NE
b. PROPER PRESERVATION TECHNIQUES USED:	☑Y ☐N ☐NA ☐NE
c. CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136:	☑Y ☐N ☐NA ☐NE
7. IF MONITORING IS PERFORMED MORE OFTEN THAN REQUIRED ARE RESULTS REPORTED ON THE DMR:	☑Y ☐N ☐NA ☐NE

SECTION E: FLOW MEASUREMENT

PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS	☑S ☐M ☐U ☐NA ☐NE
DETAILS:	
1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED:__ TYPE OF DEVICE: **9 INCH PARSHALL**	☑Y ☐N ☐NA ☐NE
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED:	☑Y ☐N ☐NA ☐NE
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED:	☑Y ☐N ☐NA ☐NE
4. CALIBRATION FREQUENCY ADEQUATE:	☑Y ☐N ☐NA ☐NE
5. RECORDS MAINTAINED OF CALIBRATION PROCEDURES:	☑Y ☐N ☐NA ☐NE
6. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE:	☑Y ☐N ☐NA ☐NE
7. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE:	☑Y ☐N ☐NA ☐NE
8. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES:	☑Y ☐N ☐NA ☐NE
9. HEAD MEASURED AT PROPER LOCATION:	☑Y ☐N ☐NA ☐NE

SECTION F: LABORATORY

PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS	☑S ☐M ☐U ☐NA ☐NE
DETAILS:	
1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(B) FOR SLUDGES) :	☑Y ☐N ☐NA ☐NE
2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED:	☐Y ☐N ☑NA ☐NE
3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT:	☑Y ☐N ☐NA ☐NE
4. QUALITY CONTROL PROCEDURES ADEQUATE:	☑Y ☐N ☐NA ☐NE
5. DUPLICATE SAMPLES ARE ANALYZED ≥10% OF THE TIME:	☑Y ☐N ☐NA ☐NE
6. SPIKED SAMPLES ARE ANALYZED ≥10% OF THE TIME:	☑Y ☐N ☐NA ☐NE
7. COMMERCIAL LABORATORY USED:	☑Y ☐N ☐NA ☐NE
a. LAB NAME:	
b. LAB ADDRESS:	
c. PARAMETERS PERFORMED: **Biomonitoring**	
8. BIOMONITORING PROCEDURES ADEQUATE:	☑Y ☐N ☐NA ☐NE
a. PROPER ORGANISMS USED:	☑Y ☐N ☐NA ☐NE
b. PROPER DILUTION SERIES FOLLOWED:	☑Y ☐N ☐NA ☐NE
c. PROPER TEST METHODS AND DURATION:	☑Y ☐N ☐NA ☐NE
d. RETESTS AND/OR TRE PERFORMED AS REQUIRED:	☑Y ☐N ☐NA ☐NE

ADEQ Water NPDES Inspection	AFIN:	Permit #:

SECTION G: EFFLUENT/RECEIVING WATERS OBSERVATIONS

BASED ON VISUAL OBSERVATIONS ONLY ☑S ☐M ☐U ☐NA ☐NE

DETAILS:

OUTFALL #:	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	COLOR	OTHER
001	NONE	NONE	NONE	NONE	NONE	CLEAR	

SECTION H: SLUDGE DISPOSAL

SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS ☐S ☐M ☐U ☑NA ☐NE

DETAILS:

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

SECTION I: SAMPLING INSPECTION PROCEDURES

SAMPLE RESULTS WITHIN PERMIT REQUIREMENTS ☐S ☐M ☐U ☑NA ☐NE

DETAILS:

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

SECTION J: STORM WATER POLLUTION PREVENTION PLAN

STORM WATER MANAGEMENT MEETS PERMIT REQUIREMENTS ☐S ☐M ☐U ☑NA ☐NE

DETAILS:

1. SWPPP UPDATED AS NEEDED:__ DATE OF LAST UPDATE: ☐Y ☐N ☐NA ☐NE
2. SITE MAP INCLUDING ALL DISCHARGES AND SURFACE WATERS: ☐Y ☐N ☐NA ☐NE
3. POLLUTION PREVENTION TEAM IDENTIFIED: ☐Y ☐N ☐NA ☐NE
4. POLLUTION PREVENTION TEAM PROPERLY TRAINED: ☐Y ☐N ☐NA ☐NE
5. LIST OF POTENTIAL POLLUTANT SOURCES: ☐Y ☐N ☐NA ☐NE
6. LIST OF POTENTIAL SOURCES AND PAST SPILLS AND LEAKS: ☐Y ☐N ☐NA ☐NE
7. ALL NON-STORM WATER DISCHARGES ARE AUTHORIZED: ☐Y ☐N ☐NA ☐NE
8. LIST OF STRUCTURAL BMPS: ☐Y ☐N ☐NA ☐NE
9. LIST OF NON-STRUCTURAL BMPS: ☐Y ☐N ☐NA ☐NE
10. BMPS PROPERLY OPERATED AND MAINTAINED: ☐Y ☐N ☐NA ☐NE
11. INSPECTIONS CONDUCTED AS REQUIRED: ☐Y ☐N ☐NA ☐NE

ADEQ Water NPDES Inspection	AFIN:	Permit #:

FLOW CALCULATION SHEET

Date: **11/9/07** Time: **1448**

Head in Inches: **11.4** Feet: **0.95**

Type & Size of Primary Flow Measurement Device: 9" Parshall Flume

Name & Model of Secondary Flow Measurement Device: **OCM II Millitronics**

Date of last Calibration of Secondary Flow Device: 10/06

Recorded Flow at Date & Time Listed Above: **1.894** (Facility Flow Meter)

Calculated Flow at Date & Time Listed Above: **1.834**

(Flow is calculated using flow charts in: ISCO Open Channel Flow Measurement Handbook-5th Edition)

$$\% \text{ Error} = \frac{\text{Recorded Value} - \text{Calculated Value}}{\text{Calculated Value}} \times 100$$

$$\% \text{ Error} = \frac{1.894 - 1.834}{1.834} \times 100$$

$$\% \text{ Error} = \frac{0.06}{1.834} \times 100$$

$$\% \text{ Error} = 0.032 \times 100$$

% Error = **3.2** %

Comments:

ADEQ Water NPDES Inspection	AFIN:	Permit #:

DMR Calculation Check

Reporting Period: From 07 (Year) 10 (Month) 01 (Day) To 07 (Year) 10 (Month) 31 (Day)

Parameter Checked: TSS

	Loading Mass Mo. Avg. - lbs/day	Concentration Monthly Mo. Avg. - mg/l	Concentration Monthly 7-day Avg. - mg/l
Reported Value:	289.4	20.7	20.5
Calculated Value:	289.4	20.7	24.2
Permit Value:	2289	90	135

If calculated value does not equal reported value, explain:

Permittee is reporting the average of all of the 7 day averages instead of reporting the maximum 7 day average.
I checked thru several months of DMR's, the parameter was never exceeded as a result of these miscalculations.

ADEQ Water NPDES Inspection	AFIN:	Permit #:

DMR Calculation Check

Reporting Period: From 07 (Year) 10 (Month) 01 (Day) To 07 (Year) 10 (Month) 31 (Day)

Parameter Checked: Ammonia

	Loading Mass Mo. Avg. - lbs/day	Concentration Monthly Mo. Avg. - mg/l	Concentration Monthly 7-day Avg. - mg/l
Reported Value:	2.4	0.167	0.167
Calculated Value:	2.4	0.167	0.198
Permit Value:	254	10	15

If calculated value does not equal reported value, explain:

Permittee is reporting the average of all of the 7 day averages instead of reporting the maximum 7 day average.
I checked thru several months of DMR's, the parameter was never exceeded as a result of these miscalculations.

AR0034126 AFIN 30-00040

TO: Anne Roberts (ADEQ)

FROM: Carl Wheatley

DATE: 9/10/08

NUMBER OF PAGES: 5

PHONE NUMBER: 501-682-0910

Hi Anne, Please attach this fax to the SSO Report that corresponds.

Thanks,

Carl Wheatley

Pump station needs backup generator.

EAR

9-10-08

Mr. Adolf N. Otberg
1100 Park Ave
Malvern, AR 72104-5911

About 4:00 AM Wed Sept 3rd 2008 we were without electric, like many others here in Malvern. At 11:00 AM our Toilets would not flush and began backing up. We quickly opened our outside drain plugs. We then noticed the man hole in the road to the front of our house was running over, spilling sewage into our yard & Rushed out to get a trench dug to divert the sewage into the drainage ditch rather than have it coming into our yard! Next we noticed, yet another manhole to the back of our yard was overflowing -- again, we had to dig another ditch, to drain that sewage out of the yard.

We Called the water department. They came out, but weren't able to do anything, because the pump station, on ~~Highland~~ Walcord rd, was without electric. they told us we needed to keep our outside drain plugs, open, to keep them from overflowing into our house. So! now! we cannot use our toilets at all!, as that would add to the sewage in our yard! NOTE!! our house drains drains were relieving the pressure of the city drains! -- "THIS SHOULD NEVER BE HAPPENING"!!

I HAD NO BACKUP GROUNDS !!

SEE NEXT PAGE #2

Our house drains were relieving the city backed up sewage problems from 11:00 AM 3rd of Sept 2008 thru friday the fifth. Saturday and sunday, the Jr High wasn't operating! But!! monday morning when we got up the manhole in front of our house was spouting -- you guessed it -- "Sewage - again! Needless to say We were more than TICKED OFF, and to make it worse, the manhole out behind the house was doing the same. "Again"

JR HIGH THE SCHOOL WAS BACK IN OPERATION

We Called the water department Again! they sent out a couple of men who got to work and went to the next manhole down stream from us. And took the High Pressure truck and blew out the problem! "Caked up grease" in the line. That gets us back to the problem of the pumping Station which had NO BACKUP GENERATOR to run when the electric goes out!!. This is the second purpose for writing this letter. There is no question in my mind that the Cost of cleaning and repairing the drains is "much more" than what a Generator would cost!! I believe that a grease Trap at the Jr High should be in order (KITCHEN.)

THE SEWER

2 - To Page 3

Note! When liquid grease leaves the Jr High school it starts to coagulate as it cools in the line, under normal conditions BUT! when the pumps electricity goes out they stop! and everything in the lines cool, and the grease solidifies plugging up the lines

Now for a third item that has bothered us is the drainage ditch along side of our house has approximately 24 sqft to run in. It is venturied down TO Less than 8 sqft by 2, 24 inch pipes. During heavy rains, they are not enough to transport the above 24 sqft ditch. — many times the ditch has run completely full. And the excess water has run over the road here on 1100 Park Avenue.

Based on all of the preceding Problems I Strongly suggest something has to be done.

I Propose #1 - Get a Backup Generator for the Pump Sta
#2 - Grease traps for Jr High school
#3 - Replace the 2 - 24" Culverts with a bridge with the approximate dimensions shown on Page 4

501-682-0910
ANNE Roberts

Page #4 OF 4

9-10-08

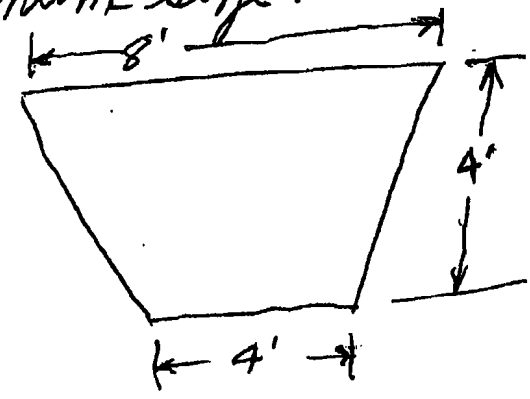
Ref my proposal on Page #3

I believe the following are "Very" necessary"

#1 – a backup Generator for the Pump station

#2 – Grease Traps for the Jr High school

#3 Replace the (2) 24" Culvert tubes with a bridge with the following minimum Size!



Yours Truly
Adolf Otberg

Mr. Adolf N. Otberg
1100 Park Ave
Malvern, AR 72104-5911