

# ADEQ

ARKANSAS  
Department of Environmental Quality

October 13, 2008

The Honorable Sheila Walters  
City of Trumann  
P.O. Box 120, 225 Hwy. 463  
Trumann, AR 72472

RE: NPDES Permit No AR0035602, AFIN 56-00047  
Proposed Consent Administrative Order

Dear Mayor Walters:

Please find enclosed a proposed Consent Administrative Order (CAO) for your consideration. As a result of our negotiations with the City, we have made revisions to the CAO we sent you earlier. The proposed civil penalty in the amount of Five Thousand Dollars (\$5,000) is our offer to settle the violations outlined in the CAO.

If after careful review and consultation you wish to accept the terms of this CAO, please sign, date, and return it by **October 27, 2008**. It will then be signed by our Director, and you will be provided with a final copy along with information about the effective date and the public notice process. Failure to contact us by the above date will constitute rejection of our settlement offer, and we will proceed with unilateral enforcement through a Notice of Violation.

Thank you for your attention to this matter. Please refer to NPDES Permit AR0038075 in any written correspondence to this Department. Should you have any questions, feel free to contact me at 501-682-0632 or you may e-mail me at [robertsa@adeq.state.ar.us](mailto:robertsa@adeq.state.ar.us).

Sincerely,



Anne Roberts  
Enforcement Administrator  
Enforcement Section  
Water Division

Enclosure

**ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY**

**IN THE MATTER OF:**

**THE CITY OF TRUMANN  
POINSETT COUNTY**

**LIS NO. 08-  
AFIN 56-00047**

**CONSENT ADMINISTRATIVE ORDER**

This Consent Administrative Order (hereinafter "CAO") is issued pursuant to Ark. Code Ann. §8-1-202(B), which authorizes the Director of the Arkansas Department of Environmental Quality (hereinafter "ADEQ" or "Department") to initiate and settle administrative enforcement actions to compel compliance with laws, orders, and regulations charged to the responsibility of the Department, including but not limited to the Federal Water Pollution Control Act, 33 U.S.C §1311 et seq., and the Arkansas Water and Air Pollution Control Act, Ark. Code Ann. §8-4-101 et seq., and all regulations issued thereunder. The Director may also propose the assessment of civil penalties as provided by Ark. Code Ann. §8-4-103(c) and the Arkansas Pollution Control and Ecology Commission Regulation No. 7, Civil Penalties, and take all actions necessary to collect such penalties.

The issues herein having been settled by the agreement of the City of Trumann ("the Permittee") and ADEQ, it is hereby agreed and stipulated that the following **FINDINGS OF FACT** and **ORDER AND AGREEMENT** be entered herein.

## FINDINGS OF FACT

1. The City of Trumann is located in Poinsett County. The Permittee operates a wastewater treatment facility pursuant to National Pollutant Discharge Elimination System (NPDES) Permit AR0035602 (hereinafter "the Permit").

2. Violations of the Permit's effluent characteristic limits for outfall number 001 found in Discharge Monitoring Reports (DMRs) submitted by the Permittee to ADEQ since January 2005 are as follows:

<u>DATE</u>	<u>PARAMETER</u>	<u>REPORTED</u>	<u>PERMITTED</u>
12/31/06	BOD (7-day avg. conc.)	158.0 mg/l	45 mg/l
04/30/07	FCB (30-day geo mean)	305 col/100 ml	200 col/100 ml
05/31/07	FCB (30-day geo mean)	298 col/100 ml	200 col/100 ml
06/30/07	FCB (30-day geo mean)	314 col/100 ml	200 col/100 ml
07/31/07	FCB (30-day geo mean)	278 col/100 ml	200 col/100 ml
08/31/07	FCB (30-day geo mean)	309 col/100 ml	200 col/100 ml
09/30/07	FCB (30-day geo mean)	297.3 col/100 ml	200 col/100 ml
12/31/07	Pimephales promelas (Chronic) Coefficient of Variation TQP6C	DMR not submitted	
12/31/07	Ceriodaphnia dubia (Chronic) Pass/Fail Growth (7-day NOEC) TWP3B	DMR not submitted	

3. The Permittee has failed to take the steps necessary to assure compliance with the effluent limits for fecal coliform bacteria (FCB) in its Permit in a timely manner:

a. The Permit, which became effective on November 1, 2003, provided interim limits for FCB, allowing the Permittee to monitor and report only, until November 1, 2006, when the following final limits for FCB came into effect:

Apr-Sept:	30-day geometric mean—200 col/100 ml 7-day average—400 col/100 ml
Oct-Mar:	30-day geometric mean—1000 col/100 ml 7-day average—2000 col/100 ml

b. Part I, Section B, Paragraph 1 of the Permit, which describes the interim limits for FCB, gave the Permittee “the option to undertake any study deemed necessary to meet the final limitations during the interim period. Any additional treatment must be approved and construction approval granted prior to final installation.”

c. Though the lowest value the Permittee reported for the FCB 30-day geometric mean when the interim limits were in place was 274 col/100 ml—well above the 200 col/100 ml final limit—the Permittee failed to take any timely action to assure it would be able to comply with the final limits. Hence, as seen in Paragraph 2 above, the Permittee violated those limits every month once the final limits for April through September came into effect in 2007.

d. The Permittee has since made changes to the operation of its wastewater treatment facility that have caused it to meet its effluent limits for FCB.

e. According to Part II, Section D(5) of the Permit, the Permittee was supposed to have notified ADEQ within fourteen days of the date it came into final compliance with its FCB limits.

4. On May 11, 2007, ADEQ performed a routine compliance inspection of the Permittee’s wastewater 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.

The inspection revealed the following violations:

a. Calibration records, temperature logs, and laboratory equipment maintenance/repair logs since December 2006 were unavailable. Part II, Section C, Paragraph 7 of the Permit requires the Permittee to maintain copies of all these records for a minimum period of three

(3) years. This is a repeat violation noted during the November 30, 2005 inspection of this facility.

b. The records of sampling and analysis were incomplete in violation of Part II, Section C, Paragraph 8 of the Permit which requires the Permittee to keep:

i. The date, exact place, time, and methods of sampling or measurements, and preservatives used, if any;

ii. The individuals(s) who performed the sampling or measurements;

iii. The date(s) analyses were performed;

iv. The individual(s) who performed the analyses;

v. The analytical techniques or methods used; and

vi. The measurements and results of such analyses.

vii. This is a repeat violation noted during the November 30, 2005 inspection of this facility.

c. The Permittee was using improper monitoring procedures in violation of Part II, Section C, Paragraph 3 of the Permit which requires monitoring to be conducted according to procedures approved under 40 CFR Part 136, unless other test procedures were specified in the Permit. Specifically, the inspector noted:

i. Positive and negative controls were not being performed for fecal coliform analysis.

ii. The media for use in fecal coliform analysis expired in April 2006, over a year prior to the inspection.

iii. The Permittee was not following the approved method for BOD which requires a DO depletion of at least 2.0 mg/l for the BOD analysis.

- iv. The Permittee was not performing a glucose-glutamic acid check on BOD analysis.
  - v. The Permittee was not drying and reweighing TSS analysis to a constant weight as required by the approved test method.
  - vi. The Permittee was not performing duplicate analysis for pH.
  - vii. These are repeat violations noted during the November 30, 2005 inspection of this facility.
- d. The Permittee was not monitoring the effluent as required by Part I, Section A of the Permit. Specifically, the inspector noted the Permittee was:
- i. Collecting three-hour composite samples instead of six-hour composite samples for BOD and TSS and a twenty-four-hour composite sample for chronic biomonitoring;
  - ii. Using composite samples for pH analysis. Samples for pH must be collected by grab sample; and
  - iii. Improperly reporting seven-day average values for all parameters.
  - iv. These are repeat violations noted during the November 30, 2005 inspection of this facility.
- e. The Permittee was improperly operating and maintaining the wastewater treatment facility in violation of Part II, Section B, Paragraph 1 of the Permit. Specifically, the inspector noted:
- i. Multiple curtains in the two lagoons were loose or detached and were in need of repair/maintenance or replacement.

ii. There were multiple small bushes/trees along the edge of the lagoon levees. Trees and bushes can undermine the integrity of the levees and offer habitat for burrowing animals.

iii. The Parshall flume was in need of cleaning. There was a substantial growth of algae in the bottom of the flume, which can lead to inaccurate flow readings and elevated BOD and TSS sample results due to shearing or washing out of the algae.

iv. The Permittee did not have a laboratory QA/QC program in place.

(1) This is a repeat violation noted during the November 30, 2005 inspection of this facility.

5. On October 1, 2 and 3, 2007, ADEQ performed a routine compliance inspection of the Permittee's wastewater 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. The inspection revealed the following violations:

a. The records of sampling and analysis were incomplete, in violation of Part II, Section C, Paragraph 8 of the Permit which requires the Permittee to keep:

i. The date, exact place, time and methods of sampling or measurements, and preservatives used, if any;

ii. The individuals(s) who performed the sampling or measurements;

iii. The date(s) analyses were formed;

iv. The individual(s) who performed the analyses;

v. The analytical techniques or methods used; and

vi. The measurements and results of such analyses.

- vii. This is a repeat violation previously noted during the November 30, 2005 and May 11, 2007 inspections.
- b. The Permittee was using improper monitoring procedures in violation of Part II, Section C, Paragraph 3 of the Permit which requires monitoring to be conducted according to procedures approved under 40 CFR Part 136, unless other test procedures were specified in the Permit. Specifically, the inspector noted:
- i. Positive and negative controls were not being performed for fecal coliform analysis. This is a repeat violation previously noted during the May 11, 2007 inspection.
  - ii. The media for use in fecal coliform analysis expired in April 2006, over a year prior to the inspection. This is a repeat violation previously noted during the May 11, 2007 inspection.
  - iii. The Permittee was not following the approved method for BOD which requires a DO depletion of at least 2.0 mg/l for the BOD analysis. This is a repeat violation previously noted during the November 30, 2005 and May 11, 2007 inspections.
  - iv. The Permittee was not performing glucose-glutamic acid check on BOD analysis. This is a repeat violation previously noted during the November 30, 2005 and May 11, 2007 inspections.
  - v. The Permittee was not drying and reweighing TSS analysis to a constant weight as required by the approved test method. This is a repeat violation previously noted during the November 30, 2005 and May 11, 2007 inspection.
  - vi. The Permittee was not performing duplicate analysis for pH. This is a repeat violation previously noted during the May 11, 2007 inspection.



vii. Records from June, July and August 2007 indicated the BOD incubator was being kept at ~110°C instead of the required 20.0°C.

viii. Records from June, July and August 2007 indicated the TSS oven was being kept at ~20°C instead of the required 103°C.

c. The Permittee was not monitoring and reporting the effluent as required by Part I, Section A of the Permit. Specifically, the inspector noted the Permittee was improperly reporting seven-day average values for all parameters. This is a repeat violation previously noted during the November 30, 2005 and May 11, 2007 inspections.

d. The Permittee was improperly operating and maintaining the wastewater treatment facility in violation of Part II, Section B, Paragraph 1 of the Permit. Specifically, the inspector noted:

i. Multiple curtains in the two lagoons were loose or detached and in need of repair/maintenance or replacement. This is a repeat violation previously noted during the November 30, 2005 and May 11, 2007 inspections.

ii. The Permittee did not have a laboratory QA/QC program in place. This is a repeat violation previously noted during the May 11, 2007 inspection.

iii. The Permittee did not have any documentation that the composite samples collected for TSS and BOD were proportioned according to flow or that the discharge during the period of the sample collection varied by less than 10%. This is a violation of Part I, Section A of the Permit and not in conformance with the definition of a six-hour composite sample in Part IV, Section A, Definition 22 of the Permit.

6. The facility failed to submit a noncompliance report (NCR) for violations of the effluent limits for fecal coliform bacteria in the months of April, May, June and July 2007 as required by Part II, Section D, Paragraph 7 of the Permit.

7. In a letter dated January 11, 2008, the Permittee responded to ADEQ's findings during the October 1, 2 and 3, 2007 inspection.

8. A review of the file reveals the Permittee did not report any sanitary sewer overflows (SSOs) from January 2005 until July 2007. The Permittee reported an SSO in June 2008 and one in July 2008. Part III, Paragraph 6 of the Permit requires the Permittee to report all SSOs in tabular format each month with the Discharge Monitoring Report, and Part II, Section D, Paragraph 6 requires the Permittee to report any discharge that can endanger human health and the environment to ADEQ within twenty-four hours of becoming aware of the discharge.

9. A.C.A. §8-4-217(a)(3) states that it shall be unlawful for a person to violate any provision of a permit issued under this chapter by ADEQ. Therefore, as a result of the foregoing violations committed by the Permittee, the following actions are proposed to be ordered herein pursuant to A.C.A §8-4-103(b).

### **ORDER AND AGREEMENT**

Therefore, the parties do hereby stipulate and agree that:

1. Within thirty (30) days of the effective date of this CAO, the Permittee shall submit to ADEQ a signed and certified statement confirming there have not been any SSOs in the City of Trumann in the past three (3) years other than those reported in July and September of 2007 and June and July of 2008 or, if the Permittee's review of the records reveals there have been other SSOs in the City of Trumann in the past three (3) years, then the Permittee shall submit corrected

monthly tabular SSO reports to ADEQ. Also within thirty (30) days of the effective date of this CAO, the Permittee shall establish and implement, and submit to ADEQ, an overflow response plan which will:

- a. Identify the individual(s) responsible for making the appropriate SSO reports (24-hour notification and monthly tabular reports) to ADEQ,
  - b. Ensure that collection system overflows are identified and responded to in a timely manner,
  - c. Establish written procedures for cleaning up after SSOs,
  - d. Have provisions to notify the affected public of overflows in parks and other public areas where access is not restricted and a reasonable potential exists for exposure to bacteria and other disease causing agents, and
  - e. Have provisions to notify any affected permit holders including municipal separate stormwater sewer permit (MS4) holders.
2. Within thirty (30) days of the effective date of this CAO, the Permittee shall identify all pumping stations that do not have direct notification alarms and submit to ADEQ a milestone schedule for installing them.
3. Within one (1) year of the effective date of this CAO, the Permittee shall establish and maintain a minimum inventory of spare parts necessary to make immediate repairs to its pump stations, wastewater lines, and manholes. The Permittee shall submit this inventory list to ADEQ upon completion of the inventory.
4. Within thirty (30) days of the effective date of this CAO, the Permittee shall submit Discharge Monitoring Reports (DMRs) and any applicable noncompliance reports required by

the Permit for the biomonitoring listed in Paragraph 2 of the Findings of Fact above for the reporting period ending December 31, 2007.

5. Immediately upon the effective date of this CAO the Permittee shall provide to ADEQ the notification of its compliance with the Permit's final effluent limits for FCB, as described in Paragraph 3(e) of the Findings of Fact section of this CAO.

6. In compromise and full settlement of the civil penalties for the violations specified in the Findings of Fact, the Permittee agrees to pay to ADEQ the total sum of **Five Thousand Dollars (\$5000.00)** as a voluntary civil penalty. Payment of the penalty shall be made for twelve (12) consecutive months, in **eleven (11) monthly installments of Four Hundred Twenty Dollars (\$420)** followed by **one (1) final monthly installment of Three Hundred Eighty Dollars (\$380)**. The first installment of the penalty shall be paid within thirty (30) days of the effective date of this CAO, and each subsequent installment shall be paid no later than the 10th day of the following month. All installments shall be made payable to the Arkansas Department of Environmental Quality and mailed to the attention of:

The Fiscal Division  
Arkansas Department of Environmental Quality  
5301 Northshore Drive  
North Little Rock, Arkansas 72118

7. All submittals required by this CAO are subject to approval by ADEQ. In the event of any deficiency, the Permittee shall within fifteen (15) days of notification by ADEQ submit any additional information requested. Failure to adequately respond to the notice of deficiency within fifteen (15) days constitutes a failure to meet a deadline and is subject to the civil penalties established in Paragraph 8 below.

8. Failure to meet the requirements, effluent limits, or construction deadlines of this CAO or the approved schedules provided for herein constitutes a violation of the CAO. If the Permittee should fail to meet any such requirements, effluent limits or deadlines, the Permittee consents and agrees to pay, on demand, to ADEQ civil penalties according to the following schedule:

- |   |                  |
|---|------------------|
| (a) First day through the tenth day:        | \$100.00 per day |
| (b) Eleventh day through the twentieth day: | \$200.00 per day |
| (c) Twenty-first day through thirtieth day: | \$300.00 per day |
| (d) Each day beyond the thirtieth day:      | \$500.00 per day |

These stipulated penalties for delays in performance shall be in addition to any other remedies or sanctions which may be available to ADEQ by reason of the Permittee's failure to comply with the requirements of this CAO.

9. If any event, including but not limited to an act of nature, occurs which causes or may cause a delay in the achievement of compliance by the Permittee with the requirements or deadlines of this CAO, the Permittee shall so notify ADEQ, in writing, as soon as reasonably possible after it is apparent that a delay will result, but in no case after the due dates specified in the Permittee's milestone schedule. The notification shall describe in detail the anticipated length of the delay, the precise cause of the delay, the measures being taken and to be taken to minimize the delay, and the timetable by which those measures will be implemented.

10. ADEQ may grant an extension of any provision of this CAO, provided that the Permittee requests such an extension in writing and provided that the delay or anticipated delay has or will be caused by circumstances beyond the control of and without the fault of the Permittee. The time for performance may be extended for a reasonable period but in no event longer than the

period of delay resulting from such circumstances. The burden of proving that any delay is caused by circumstances beyond the control of and without the fault of the Permittee and the length of the delay attributable to such circumstances shall rest with the Permittee. Failure to notify the ADEQ promptly, as provided in Paragraph 9 of this section, shall be grounds for a denial of an extension.

11. This CAO is subject to public review and comment in accordance with A.C.A. §8-4-103 (d) and Arkansas Pollution Control and Ecology Commission Regulation No. 8 and shall not be effective until thirty (30) days after public notice is given. ADEQ retains the right to rescind this CAO based upon the comments received within the thirty-day public comment period.

Notwithstanding the public notice requirements, the corrective actions necessary to achieve compliance with the terms of the Permit shall be taken immediately.

12. As provided by Arkansas Pollution Control and Ecology Commission Regulation No. 8, this matter is subject to being reopened upon Commission initiative or in the event a petition to set aside this CAO is granted by the Commission.

13. Nothing in this CAO shall be construed as a waiver by ADEQ of its enforcement authority over alleged violations not specifically addressed herein. Also, this CAO does not exonerate the Permittee from any past, present, or future conduct which is not expressly

addressed herein, nor does it relieve the Permittee of its responsibilities for obtaining any necessary permits.

SO ORDERED THIS \_\_\_\_\_ DAY OF \_\_\_\_\_, 2008

\_\_\_\_\_  
Teresa Marks, Director

APPROVED AS TO FORM AND CONTENT:

BY: \_\_\_\_\_  
(Signature)

\_\_\_\_\_  
(Typed or printed name)

TITLE: \_\_\_\_\_  
(Typed or printed title)

DATE: \_\_\_\_\_



ARKANSAS  
Department of Environmental Quality

November 27, 2007

Gerald Smith, General Manager  
City of Trumann WWTP  
106 E. Main St.  
Trumann, AR 72472

RE: Waste Water Treatment Plant

AFIN: 56-00047

NPDES Permit No.: AR0035602

Dear Mr. Smith:

On October 1, 2, and 3, 2007, I performed a routine compliance sampling 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. Sampling and analysis records were incomplete; this violates Part II Section C:8 of the permit. Records and monitoring information shall include:**

**\*\*REPEAT VIOLATION\*\***

- a. The date, exact place, time and methods of sampling or measurements, and preservatives used, if any;
- b. The individuals(s) who performed the sampling or measurements;
- c. The date(s) and time analyses were performed;
- d. The individual(s) who performed the analyses;
- e. The analytical techniques or methods used; and
- f. The measurements and results of such analyses.

**2. Improper monitoring procedures; this violates Part II Section C:3. of the permit. Monitoring must be conducted according to test procedures approved under 40 CFR Part 136, unless other test procedures have been specified in this permit. The permittee shall calibrate and perform maintenance procedures on all monitoring and analytical instrumentation at intervals frequent enough to insure accuracy of measurements and shall insure that both calibration and maintenance activities will be conducted. An adequate analytical quality control program, including the analysis of sufficient standards, spikes, and duplicate samples to insure the accuracy of all required analytical results shall be maintained by the permittee or designated commercial laboratory. At a minimum, spikes and duplicate samples are to be**



analyzed on 10% of the samples. At the time of the inspection, the following items were noted:

- a. No positive and negative control was being performed for fecal coliform analysis. **\*\*REPEAT VIOLATION\*\***
  - b. The media for use in fecal coliform analysis expired over 1 year ago (April 2006). **\*\*REPEAT VIOLATION\*\***
  - c. Not following the depletion rule (consumption of at least 2 mg/L of D.O.) for BOD analysis. **\*\*REPEAT VIOLATION\*\***
  - d. Not performing glucose – glutamic acid check for BOD analysis. **\*\*REPEAT VIOLATION\*\***
  - e. No drying and reweighing to a constant weight for TSS analysis. **\*\*REPEAT VIOLATION\*\***
  - f. Not performing duplicates for pH analysis. **\*\*REPEAT VIOLATION\*\***
  - g. Records from June, July and August, 2007 indicated that the BOD incubator was being kept at ~110°C instead of the required 20.0°C.
  - h. Records from June, July and August, 2007 indicated that the TSS oven was being kept at ~20°C instead of the required 103°C.
3. Improper monitoring and reporting of effluent; this violates Part I Section A. of the permit. Improper reporting of the 7-day average for all parameters. Part IV Section A: Definition 14 States: “7-day average” discharge limitation, other than for fecal coliform bacteria, is the highest allowable arithmetic means of the values for all effluent samples collected during the calendar week. The 7-day average for fecal coliform bacteria is the geometric mean of the values of all effluent samples collected during the calendar week in colonies/100 ml. The DMR should report the highest 7-day average obtained during the calendar month. For reporting purposes, the 7-day average values should be reported as occurring in the month in which the Saturday of the calendar week falls in. **\*\*REPEAT VIOLATION\*\***
4. Improper operation and maintenance; this violates Part II Section B:1.a. of the permit. The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures.
- a. Multiple curtains in the two lagoons were loose or detached and were in need of repair/maintenance/replacement. **\*\*REPEAT VIOLATION\*\***
  - b. There was no laboratory QA/QC program in place. **\*\*REPEAT VIOLATION\*\***
5. There was no documentation that the composite samples collected for TSS and BOD were proportioned according to flow or that the discharge during the period of sample collection varied by less than 10%. This violates Part I Section A: of the permit and Part IV Section A: Definition 22.

- 6. The facility violated the Monthly Average for Fecal Coliform Bacteria in April, May, June and July, 2007. This violates Part I Section A: of the permit. Additionally a Noncompliance Report was not submitted with the DMRs; this violates Part II Section D: 7. of the permit. You should submit a Noncompliance report for each violation that includes the following items:**
  - a. Description of the violations,**
  - b. Reason for the violations,**
  - c. Duration of the violations,**
  - d. Corrective action being taken to eliminate the violations,**
  - e. Compliance date or expected compliance date,**
  - f. Original signature of the cognizant official.**
  
- 7. Failure to have the effluent flow meter calibrated at least once per year and to perform routine calibration checks to insure continued accuracy of the flow measuring device; this violates Part II Section C:2. of the permit. Appropriate flow measurement devices and methods consistent with accepted scientific practices shall be selected and used to insure the accuracy and reliability of measurements of the volume of monitored discharges. The devices shall be installed, calibrated, and maintained to insure the accuracy of the measurements are consistent with the accepted capability of that type of device. Devices selected shall be capable of measuring flows with a maximum deviation of less than +/- 10% from true discharge rates throughout the range of expected discharge volumes and shall be installed at the monitoring point of the discharge.**

The above items require 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 items noted. This corrective action should be completed as soon as possible, and the written response is due by December 20, 2007.

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

Gerald Smith, Trumann WWTP  
November 27, 2007  
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If I can be of any assistance, please contact me at [walker@adeq.state.ar.us](mailto:walker@adeq.state.ar.us) or 870-935-7221 ext.-12.

Sincerely,



Brent L. Walker  
District 3 Field Inspector  
Water Division

cc: Water Division Enforcement Branch  
Water Division Permits Branch



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

Form Approved  
OMB No. 2040-0003

## NPDES Compliance Inspection Report

### Section A: National Data System Coding

Transaction Code	NPDES	Yr/Mo/Day	Inspec. Type	Inspector	Fac. Type
1 <input type="text" value="N"/> 2 <input type="text" value="5"/> 3 <input type="text" value="A"/> <input type="text" value="R"/> <input type="text" value="0"/> <input type="text" value="0"/> <input type="text" value="3"/> <input type="text" value="5"/> <input type="text" value="6"/> <input type="text" value="0"/> <input type="text" value="2"/>	11 <input type="text" value="0"/> 12 <input type="text" value="7"/> 13 <input type="text" value="1"/> 14 <input type="text" value="0"/> 15 <input type="text" value="0"/> 16 <input type="text" value="1"/>	17 <input type="text" value="S"/>	18 <input type="text" value="S"/>	19 <input type="text" value="S"/>	20 <input type="text" value="1"/>
Remarks					
Inspection Work Days		Facility Evaluation Rating		BI	
67 <input type="text" value=""/> <input type="text" value=""/> 69		70 <input type="text" value="1"/>		71 <input type="text" value="N"/> 72 <input type="text" value="N"/> 73 <input type="text" value=""/> 74 <input type="text" value=""/> 75 <input type="text" value=""/> 80	

### Section B: Facility Data

Name and Location of Facility Inspected ( <i>For industrial users discharging to POTW, also include POTW name and NPDES permit number</i> ) <b>Trumann WWTP</b> <b>¼ mile north of Hwy 69 and Hwy 198 Intersection</b> <b>E. of Hwy 69</b> <b>Trumann, AR</b>	Entry Time/Date <b>0940 10/01/2007 1345 10/02/2007</b> <b>0845 10/03/2007</b>	Permit Effective Date <b>November 1, 2003</b>
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) <b>Gerald Smith/General Manager/870-483-6343</b> <b>Molly Halsey/Office Clerk</b>	Other Facility Data	
Name, Address of Responsible Official/Title/Phone and Fax Number <b>Gerald Smith/General Manager/870-483-6343</b> <b>City of Trumann WWTP</b> <b>106 E. Main St.</b> <b>Trumann, AR 72472</b>	Contacted Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	

### Section C: Areas Evaluated During Inspection

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

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

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

\*\*\*Multiple Repeat Violations\*\*\*

\*\*\*See attached sheet for a Summary of Findings/Comments\*\*\*

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Telephone/Fax	Date
Brent L. Walker	AR Dept. of Environmental Quality-Jonesboro (870) 935-7221 ext. 12/(870) 935-4715 (Fax)	November 27, 2007
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date

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

**SECTION D: SAMPLING**

PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS

S M U NA NEDETAILS: Samples not flow proportioned as required by permit.

1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT:	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
6. SAMPLE COLLECTION PROCEDURES ADEQUATE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
a. SAMPLES REFRIGERATED DURING COMPOSITING: <u>Ice in sampler</u>	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
b. PROPER PRESERVATION TECHNIQUES USED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
c. CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
7. IF MONITORING IS PERFORMED MORE OFTEN THAN REQUIRED ARE RESULTS REPORTED ON THE DMR:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE

**SECTION E: FLOW MEASUREMENT**

PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS

S M U NA NEDETAILS: No calibration checks or recent calibration.

1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: __ TYPE OF DEVICE: <u>9" Parshall Flume</u>	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED:	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
4. CALIBRATION FREQUENCY ADEQUATE:	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
5. RECORDS MAINTAINED OF CALIBRATION PROCEDURES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
6. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE:	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
7. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
8. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
9. HEAD MEASURED AT PROPER LOCATION:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE

**SECTION F: LABORATORY**

PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS

S M U NA NEDETAILS: No QA/QC

1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(B) FOR SLUDGES) :	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT:	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
4. QUALITY CONTROL PROCEDURES ADEQUATE:	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
5. DUPLICATE SAMPLES ARE ANALYZED $\geq$ 10% OF THE TIME:	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
6. SPIKED SAMPLES ARE ANALYZED $\geq$ 10% OF THE TIME:	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
7. COMMERCIAL LABORATORY USED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
a. LAB NAME: <u>Arkansas State University Ecotoxicology Research Facility</u>	
b. LAB ADDRESS: <u>State University, AR</u>	
c. PARAMETERS PERFORMED: <u>Chronic Biomonitoring</u>	
8. BIOMONITORING PROCEDURES ADEQUATE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
a. PROPER ORGANISMS USED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
b. PROPER DILUTION SERIES FOLLOWED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
c. PROPER TEST METHODS AND DURATION:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
d. RETESTS AND/OR TRE PERFORMED AS REQUIRED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE

**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	Slight	None	None	Lt. Green	--

**SECTION H: SLUDGE DISPOSAL**

SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS S M U NA NE

DETAILS: Sludge remains in lagoons

1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY:	<input type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503:	<input type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input checked="" type="checkbox"/> NA <input type="checkbox"/> 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:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
2. TYPE OF SAMPLE: <input checked="" type="checkbox"/> GRAB: <u>pH &amp; FCB</u> <input checked="" type="checkbox"/> COMPOSITE: <u>BOD5, TSS</u> METHOD: <u>Manual Grab and Autosampler</u> FREQUENCY: <u>1/hr for 6 hrs</u>	
3. SAMPLES PRESERVED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
4. FLOW PROPORTIONED SAMPLES OBTAINED: <u>Flow varied by &lt;10% during period of collection</u>	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE:	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
6. SAMPLE REPRESENTATIVE OF VOLUME AND NATURE OF DISCHARGE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
7. SAMPLE SPLIT WITH PERMITTEE:	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE

**SECTION J: STORM WATER POLLUTION PREVENTION PLAN**

STORM WATER MANAGEMENT MEETS PERMIT REQUIREMENTS S M U NA NE

DETAILS: No Exposure Exclusion ARR000270

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

## FLOW CALCULATION SHEET

Date:	<b>10/02/2007</b>	Time:	<b>1542</b>		
Head in Inches:	<b>7.375</b>	Feet:	<b>0.614</b>		
Type & Size of Primary Flow Measurement Device:					
<b>9" Parshall Flume</b>					
Name & Model of Secondary Flow Measurement Device:				<b>BIF-DC Totalizer Model 257-21</b>	
Date of last Calibration of Secondary Flow Device:				<b>3/15/2006</b>	
Recorded Flow at Date & Time Listed Above:				<b>0.897</b>	(Facility Flow Meter)
Calculated Flow at Date & Time Listed Above:				<b>0.9313</b>	
<small>(Flow is calculated using flow charts in: ISCO Open Channel Flow Measurement Handbook-5<sup>th</sup> Edition)</small>					
% Error =	Recorded Value	-	Calculated Value	X 100	
	Calculated Value				
% Error =	0.897	-	0.9313	X 100	
	0.9313				
% Error =	-0.0343			X 100	
	0.9313				
% Error =	-0.037			X 100	
% Error =	<b>-3.7</b>	%			
Comments: <b>Less than +/-10% Error</b>					



**DMR Calculation Check**

**Reporting Period:** From 2007 06 01 To 2007 06 30  
Year Month Day Year Month Day

**Parameter Checked:** FCB

	<b>Loading Mass Mo. Avg. - lbs/day</b>	<b>Concentration Monthly Mo. Avg. - mg/l</b>	<b>7-day Avg. - mg/l</b>
<b>Reported Value:</b>	<u>NA</u>	<u>3.06*</u>	<u>356*</u>
<b>Calculated Value:</b>	<u>NA</u>	<u>301*</u>	<u>327*</u>
<b>Permit Value:</b>	<u>NA</u>	<u>200</u>	<u>400</u>

**If calculated value does not equal reported value, explain:** Not using geometric mean.  
Also reporting daily max instead of highest 7-day average.  
Exceeded permit limit for monthly average.

**DMR Calculation Check**

**Reporting Period: From** 2007 07 01 **To** 2007 07 31  
Year Month Day Year Month Day

**Parameter Checked:** FCB

	<b>Landing Mass Mo. Avg. - lbs/day</b>	<b>Concentration Monthly Mo. Avg. - mg/l</b>	<b>7-day Avg. - mg/l</b>
<b>Reported Value:</b>	<u>NA</u>	<u>278*</u>	<u>344*</u>
<b>Calculated Value:</b>	<u>NA</u>	<u>301*</u>	<u>322*</u>
<b>Permit Value:</b>	<u>NA</u>	<u>200</u>	<u>400</u>

**If calculated value does not equal reported value, explain:** Not using geometric mean.  
Also reporting daily max instead of highest 7-day average.  
Exceeded permit limit for monthly average.

## NPDES Compliance Inspection Report Further Explanation

### Compliance Sampling Inspection Results of Analysis\*:

pH 7.51 S.U.

BOD5 8.51 mg/l

TSS 22.5 mg/l

FCB 208 CFU/100 ml

\*All within permit limits.

### The following violations were noted:

1. **Sampling and analysis records were incomplete; this violates Part II Section C:8 of the permit. Records and monitoring information shall include:**

**\*\*REPEAT VIOLATION\*\***

- a. **The date, exact place, time and methods of sampling or measurements, and preservatives used, if any;**
- b. **The individuals(s) who performed the sampling or measurements;**
- c. **The date(s) and time analyses were performed;**
- d. **The individual(s) who performed the analyses;**
- e. **The analytical techniques or methods used; and**
- f. **The measurements and results of such analyses.**

2. **Improper monitoring procedures; this violates Part II Section C:3. of the permit. Monitoring must be conducted according to test procedures approved under 40 CFR Part 136, unless other test procedures have been specified in this permit. The permittee shall calibrate and perform maintenance procedures on all monitoring and analytical instrumentation at intervals frequent enough to insure accuracy of measurements and shall insure that both calibration and maintenance activities will be conducted. An adequate analytical quality control program, including the analysis of sufficient standards, spikes, and duplicate samples to insure the accuracy of all required analytical results shall be maintained by the permittee or designated commercial laboratory. At a minimum, spikes and duplicate samples are to be analyzed on 10% of the samples. At the time of the inspection, the following items were noted:**

- a. **No positive and negative control was being performed for fecal coliform analysis. \*\*REPEAT VIOLATION\*\***
- b. **The media for use in fecal coliform analysis expired over 1 year ago (April 2006). \*\*REPEAT VIOLATION\*\***
- c. **Not following the depletion rule (consumption of at least 2 mg/L of D.O.) for BOD analysis. \*\*REPEAT VIOLATION\*\***
- d. **Not performing glucose – glutamic acid check for BOD analysis. \*\*REPEAT VIOLATION\*\***
- e. **No drying and reweighing to a constant weight for TSS analysis. \*\*REPEAT VIOLATION\*\***
- f. **Not performing duplicates for pH analysis. \*\*REPEAT VIOLATION\*\***
- g. **Records from June, July and August, 2007 indicated that the BOD incubator was being kept at ~110°C instead of the required 20.0°C.**

- h. Records from June, July and August, 2007 indicated that the TSS oven was being kept at ~20°C instead of the required 103°C.**
- 3. Improper monitoring and reporting of effluent; this violates Part I Section A. of the permit. Improper reporting of the 7-day average for all parameters. Part IV Section A: Definition 14 States: "7-day average" discharge limitation, other than for fecal coliform bacteria, is the highest allowable arithmetic means of the values for all effluent samples collected during the calendar week. The 7-day average for fecal coliform bacteria is the geometric mean of the values of all effluent samples collected during the calendar week in colonies/100 ml. The DMR should report the highest 7-day average obtained during the calendar month. For reporting purposes, the 7-day average values should be reported as occurring in the month in which the Saturday of the calendar week falls in. **\*\*REPEAT VIOLATION\*\*****
- 4. Improper operation and maintenance; this violates Part II Section B:1.a. of the permit. The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures.**
- a. Multiple curtains in the two lagoons were loose or detached and were in need of repair/maintenance/replacement. **\*\*REPEAT VIOLATION\*\*****
- b. There was no laboratory QA/QC program in place. **\*\*REPEAT VIOLATION\*\*****
- 5. There was no documentation that the composite samples collected for TSS and BOD were proportioned according to flow or that the discharge during the period of sample collection varied by less than 10%. This violates Part I Section A: of the permit and Part IV Section A: Definition 22.**
- 6. The facility violated the Monthly Average for Fecal Coliform Bacteria in April, May, June and July, 2007. This violates Part I Section A: of the permit. Additionally a Noncompliance Report was not submitted with the DMRs; this violates Part II Section D: 7. of the permit.**
- 7. Failure to have the effluent flow meter calibrated at least once per year and to perform routine calibration checks to insure continued accuracy of the flow measuring device; this violates Part II Section C:2. of the permit. Appropriate flow measurement devices and methods consistent with accepted scientific practices shall be selected and used to insure the accuracy and reliability of measurements of the volume of monitored discharges. The devices shall be installed, calibrated, and maintained to insure the accuracy of the measurements are consistent with the accepted capability of that type of device. Devices selected shall be capable of measuring flows with a maximum deviation of less than +/- 10% from true discharge rates throughout the range of expected discharge volumes and shall be installed at the monitoring point of the discharge.**

**Water Division NPDES Photographic Evidence Sheet**

<b>Location:</b>	Trumann WWTP		
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<b>Photographer:</b>	Brent Walker	<b>Witness:</b>	None
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<b>Photo #</b>	1	<b>Of</b>	4		<b>Date:</b>	10/02/2007	<b>Time:</b>	1420
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<b>Description:</b>	Loose curtain in lagoon.		
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<b>Photographer:</b>	Brent Walker	<b>Witness:</b>	None
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<b>Photo #</b>	2	<b>Of</b>	4		<b>Date:</b>	10/02/2007	<b>Time:</b>	1420
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<b>Description:</b>	Closer view of loose curtain shown above.		
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**Water Division NPDES Photographic Evidence Sheet**

<b>Location:</b>	Trumann WWTP		
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<b>Photographer:</b>	Brent Walker	<b>Witness:</b>	None
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<b>Photo #</b>	3	<b>Of</b>	4	<b>Date:</b>	10/02/2007	<b>Time:</b>	1425
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<b>Description:</b>	Loose and deteriorated curtain.		
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<b>Photographer:</b>	Brent Walker	<b>Witness:</b>	None
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<b>Photo #</b>	4	<b>Of</b>	4	<b>Date:</b>	10/02/2007	<b>Time:</b>	1425
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<b>Description:</b>	Closer view of deteriorated curtain.		
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#037167 E

**Trumann Water Works**  
**106 E. Main Street**  
**Trumann, Arkansas 72472**  
**Phone: (870) 483-6343**  
**Fax: (870) 483-6525**



January 11, 2008

Mr. Brent Walker  
District Field Inspector - Water Division  
Arkansas Department of  
Environmental Quality  
5301 Northshore Drive  
North Little Rock, AR 72118-5317

**Re: NPDES Permit No.: AR0035602      AFIN: 56-00047**

Dear Mr. Hurley:

In response to your letter of November 27, 2007 wherein you cited several violations at the Trumann Water Works Treatment Plant, I submit the following:

1. Sampling methods and analysis conclusions are now being noted on bench cards along with required information such as, analyst's initials, time, date and measurements.
2. Positive and negative controls are being performed now. We are calibrating instruments daily before each sample or samples to be analyzed. We are performing maintenance on our instruments by following the manufacture's recommendations. We have purchased and are using new fecal coliform media and broth. WE are now following the minimum depletion rule and performing the GGA quality assurance test. We are falling within acceptable range prescribed by the latest edition of standards and methods book. We are drying and reweighing every hour our TSS samples and recording them once they stabilize. We have corrected the record keeping for the BOD incubator and TSS oven and calibrating them against a NSIT certified thermometer.
3. The seven day average effluent is now being recorded and reported correctly.
4. We are working with the current administration of the City to apply for a grant and to generate funds for the repair or replacement of the lagoon curtain.
5. Sample sizes are now being adjusted during spikes and documented.
6. Fecal coliform results were calculated in arithmetic means but are now being calculated in geometric means, which has caused us to meet our permit requirements.



**Letter to Mr. Brent Walker**  
**January 11, 2008**  
**Page 2**

7. Calibration and Controls, Inc., Benton, Arkansas, performs annual calibrations on our effluent meter. We are currently looking into purchasing an external device to routinely check our effluent flow. I have enclosed copies of invoices for 2007 indicating that we had the effluent meter repaired and calibrated.

If you have questions or need further information, please do not hesitate to contact me at my office at the phone number listed above.

Sincerely,

A handwritten signature in black ink, appearing to read "Gerald D. Smith", with a long horizontal flourish extending to the right.

Gerald D. Smith  
General Manager

Enclosures

Gds/slj/pgd

Jeff Porterfield  
 1156 Salem Road  
 Benton, AR 72015  
 #501-316-3285 Fax #501-794-3285


DATE	INVOICE #
7/20/2007	4901

<b>BILL TO</b>
Trumann Waste Water Plant 106 E. Main Trumann, AR 72472

P.O. NO.	TERMS	JOB #	SERVICE DATE
	Due upon receipt	51145	07/10/07

DESCRIPTION	AMOUNT
Trumann Waste Water Trumann, AR,  Waste Water Treatment Plant:  Install solenoid valve on valve at Waste Water Treatment Plant.  Install two relays for power failure and put system back in operation.  Water Plant:  Check out CL2 solenoid valve. Valve is bad. Will return with new valve in two to three weeks.  Solenoid Valve 2 Relays & Bases 1 Rail Labor: 8 hours x \$65.00/hr.	574.50T 70.00T 3.00T 520.00T

TRUMANN WATER & SEWER.COM  
 AUG - 6 2007  
 PAID

17230.02 

<b>Subtotal</b>	\$1,167.50
<b>Sales Tax (8.25%)</b>	\$96.32
<b>Total</b>	\$1,263.82
<b>Balance Due</b>	\$1,263.82

# SERVICE REPORT

JOB LOCATION Thurman Waste Water  
ADDRESS Whisper Hill  
DATE 7-10-07  
P.O. # \_\_\_\_\_  
SERVICE REQUESTED BY: Joe

## DESCRIPTION OF WORK:

1. Install Solenoid Valve on Pinch Valve at WWTP  
Install 2 relays for power failure and get system back in operation

Interpret it check out the Solenoid Valve valve is Bad w. P. Return with new valve in 2-3 weeks

EQUIPMENT SERVICED	MODEL #	SERIAL #
1- Solenoid Valve		
2- Relays + Bases		
1' Rail		

WORK HOURS 3  
TRAVEL HOURS 3 TOTAL HOURS 6

AUTHORIZED SIGNATURE Joe M  
CALIBRATION & CONTROLS INC. TECHNICIAN Jeff Stegert

**CALIBRATION & CONTROLS, INC.**

**Invoice**

Jeff Porterfield  
 1156 Salem Road  
 Benton, AR 72015  
 #501-316-3285 Fax #501-794-3285

DATE	INVOICE #
6/14/2007	4893

<b>BILL TO</b>
Trumann Waste Water Plant 106 E. Main Trumann, AR 72472

P.O. NO.	TERMS	JOB #	SERVICE DATE
	Due upon receipt		05/29/07

DESCRIPTION	AMOUNT
Trumann Waste Water Trumann, AR.  Effluent flow not working correctly. Found bad relay & solenoid valve sticking. Will return with new solenoid valve & relay.  Labor: 8 hours x \$65.00/hr.	520.00T

7230.02  


TRUMANN WATER & SEWER COMM.  
 JUL 1 2007  
**PAID**

<b>Subtotal</b>	\$520.00
<b>Sales Tax (8.25%)</b>	\$42.90
<b>Total</b>	\$562.90
<b>Balance Due</b>	\$562.90

# SERVICE REPORT

JOB LOCATION Tennon Waste Water  
ADDRESS Tennon Ave  
DATE 8-19-07  
P.O. # \_\_\_\_\_  
SERVICE REQUESTED BY: JOE

## DESCRIPTION OF WORK:

1. Effluent Flow not working correctly  
Found bad Relay & Solenoid Valve Striking  
will return with new Solenoid Valve  
& Relay -

EQUIPMENT SERVICED	MODEL #	SERIAL #

WORK HOURS 2  
TRAVEL HOURS 6 TOTAL HOURS 8

AUTHORIZED SIGNATURE [Signature]  
CALIBRATION & CONTROLS INC. TECHNICIAN [Signature]