

NPDES ENFORCEMENT SECTION, WATER DIVISION

CAO ENFORCEMENT ACTION ROUTING SLIP

RE-ROUTING OF PREVIOUSLY APPROVED CAO

FACILITY NAME: **ALMA, CITY OF**

DATE: June 12, 2008

CAO LIS # _____

ACTION # **5736**

AFIN Number: **17-00059**

ACCESS KEY #**431 -**

NPDES Number: AR0021466

	INITIALS	DATE
TERESA MARKS, DIRECTOR	Jm	7/28/08
STEVE MARTIN, DEPUTY DIRECTOR	SM	July 24, 08
LEGAL REVIEW BY: <i>Jamie Ewing</i>	JRE	7/18/08
STEVE DROWN, CHIEF of the WATER DIVISION	SD	23 JULY 08
MO SHAFII, ASSISTANT CHIEF of the WATER DIVISION	MO	6/18/08
DAVID RAMSEY, PCS SENIOR PROGRAM ANALYST	DR	6-13-8
CINDY GARNER, TECHNICAL ASSISTANCE MANAGER, WATER ENFORCEMENT	Cg	6-12-08
SAM SAWYER, PROGRAM SUPPORT MANAGER, WATER ENFORCEMENT	SS	6-12-08
ANNE ROBERTS, ENFORCEMENT ADMINISTRATOR WATER ENFORCEMENT	EAR	6-12-08

Rec'd
back
7/18

COMMENTS: A previous version of this CAO has already been routed and is included in this folder. In the revised order, two violations were removed and four were reduced after negotiations with the City. The originally proposed total penalty of \$12,200 has been reduced by 56% to **\$5,400.**

Bypass and SSO Report

by NPID and DATE RANGE

Thursday, June 12, 2008

		Description	Cause	Actions		
AR002 ALMA, CITY OF						
				Other id/Permit Number:		Name:
8322	start	8/27/2004	1000 gallons	<input type="checkbox"/> Capacity	<input type="checkbox"/> Non-Capacity	<input type="checkbox"/> Bypass <input type="checkbox"/> SSO
	stop	8/28/2004	Kimes Field - Highway 71 North	Roots or grease		Jet rodded line from both directions eliminating the blockage, limed the area around the manhole
Location:						
8864	start	11/1/2004	900 gallons	<input checked="" type="checkbox"/> Capacity	<input type="checkbox"/> Non-Capacity	<input checked="" type="checkbox"/> Bypass <input type="checkbox"/> SSO
	stop	11/1/2004	Mulberry Street	Heavy rains and grease		Jet rodded line to eliminate the blockage
Location:						
8865	start	11/15/2004	2160 gallons	<input type="checkbox"/> Capacity	<input checked="" type="checkbox"/> Non-Capacity	<input type="checkbox"/> Bypass <input checked="" type="checkbox"/> SSO
	stop	11/15/2004	1034 Highway 71 North	blockage		Jet rodded line to eliminate the blockage and lime applied to the area
Location:						
8866	start	11/18/2004	360 gallons	<input type="checkbox"/> Capacity	<input checked="" type="checkbox"/> Non-Capacity	<input type="checkbox"/> Bypass <input checked="" type="checkbox"/> SSO
	stop	11/18/2004	Highway 64 East	Blockage & heavy rainfall		Jet rodded line to eliminate the blockage
Location:						
9211	start	1/28/2005	300 gallons	<input type="checkbox"/> Capacity	<input checked="" type="checkbox"/> Non-Capacity	<input type="checkbox"/> Bypass <input checked="" type="checkbox"/> SSO
	stop	1/28/2005	Highway 64 East, manhole #21-14	Blockage		Jet rodded line to eliminate the blockage
Location:						
9856	start	6/17/2005	1800 gallons	<input type="checkbox"/> Capacity	<input checked="" type="checkbox"/> Non-Capacity	<input type="checkbox"/> Bypass <input checked="" type="checkbox"/> SSO
	stop	6/17/2005	35 Column Lane pump station	Power outage - lightning		Replaced damaged control components & wiring
Location:						

		<i>Description</i>	<i>Cause</i>	<i>Actions</i>
10032	start 8/12/2005	15 gallons	<input type="checkbox"/> Capacity <input checked="" type="checkbox"/> Non-Capacity	<input type="checkbox"/> Bypass <input checked="" type="checkbox"/> SSO
	stop 8/12/2005	823 Highway 71 North	blockage	Jet rodded line to eliminate the blockage
Location:				
10270	start 10/17/2005	2160 gallons	<input type="checkbox"/> Capacity <input checked="" type="checkbox"/> Non-Capacity	<input type="checkbox"/> Bypass <input checked="" type="checkbox"/> SSO
	stop 10/17/2005	manhole #21-10-1 in grassy field on south side of Hwy. 64 B overflowed	blockage due to grease and roots	pressure cleaned and chmically treated for roots and grease
Location:				
10554	start 1/5/2006	200 gallons	<input type="checkbox"/> Capacity <input checked="" type="checkbox"/> Non-Capacity	<input type="checkbox"/> Bypass <input checked="" type="checkbox"/> SSO
	stop 1/5/2006	overflow at 222 Main St., Manhole 27-1-3	unknown blockage in line	pressure cleaned sewer main to remove blockage, spread lime in ditch area, no standing water
Location:				
10725	start 1/23/2006	50 gallons	<input type="checkbox"/> Capacity <input checked="" type="checkbox"/> Non-Capacity	<input type="checkbox"/> Bypass <input checked="" type="checkbox"/> SSO
	stop 1/23/2006	overflow at manhole # 21-11 near 814 E. Cherry St.	unknown blockage	pressure rodded main to remove blockage; small amount of water was around manhole-limed area.
Location:				
11469	start 5/1/2006	2000 gallons	<input type="checkbox"/> Capacity <input checked="" type="checkbox"/> Non-Capacity	<input type="checkbox"/> Bypass <input checked="" type="checkbox"/> SSO
	stop 5/1/2006	overflow at Collum Lane Lift Station	electrical fuses blown on in-coming power; possibly caused by lightening.	Electrician repaired pumps and electrical components
Location: Collum Lane, Alma				
11750	start 6/6/2006	1500 gallons	<input type="checkbox"/> Capacity <input checked="" type="checkbox"/> Non-Capacity	<input type="checkbox"/> Bypass <input checked="" type="checkbox"/> SSO
	stop 6/6/2006		equipment failure	repaired the equipment
Location: Collum Lane lift station				
12139	start 11/17/2006	1000 gallons	<input type="checkbox"/> Capacity <input checked="" type="checkbox"/> Non-Capacity	<input type="checkbox"/> Bypass <input checked="" type="checkbox"/> SSO
	stop 11/17/2006	Very small overflow at Manhole #23-2-3	Blockage caused by roots or grease	Pressure rodded to remove blockage and spread lime around manhole area.
Location:				
12624	start 11/17/2006	999 gallons	<input type="checkbox"/> Capacity <input checked="" type="checkbox"/> Non-Capacity	<input type="checkbox"/> Bypass <input checked="" type="checkbox"/> SSO
	stop 11/17/2006	Manhole overflow	Blockage caused by roots or grease	Pressure rodded to remove blockage and spread lime around manhole area
Location: Manhole 23-2-3				

		<i>Description</i>	<i>Cause</i>	<i>Actions</i>
13816	<i>start</i> 5/21/2007	5000 gallons	<input type="checkbox"/> Capacity <input checked="" type="checkbox"/> Non-Capacity	<input type="checkbox"/> Bypass <input checked="" type="checkbox"/> SSO
	<i>stop</i> 5/21/2007	Discharge is ponding in low area of pature.	Excessive grease and other	Pressure rodded to remove blockage
<i>Location:</i> In pasture				
15475	<i>start</i> 3/3/2008	6000 gallons	<input type="checkbox"/> Capacity <input type="checkbox"/> Non-Capacity	<input type="checkbox"/> Bypass <input type="checkbox"/> SSO
	<i>stop</i> 3/3/2008	1 - 2 HOUR OVERFLOW NEXT TO MANHOLE #27-E-8	UNKNOWN (MAY HAVE BEEN DUE TO ABOUT 4 INCHES OF RAINFALL)	N/A
<i>Location:</i>				
16457	<i>start</i> 4/10/2008	518400 gallons	<input type="checkbox"/> Capacity <input type="checkbox"/> Non-Capacity	<input type="checkbox"/> Bypass <input type="checkbox"/> SSO
	<i>stop</i> 5/1/2008	MH #36-W3 WAS PARTIALLY WASHED AWAY DUE TO HEAVY RAINS, CAUSING PIPE TO BREAK.	FLOODING RAINS FROM 4/9/08.	PERFORMED TEMPORARY REPAIR TO SEWER LINE, UNTIL SUCH TIME A CONTRACTOR IS HIRED AND A NEW MANHOLE AND SEWER LINE IS COMPLETED.
<i>Location:</i>				
16048	<i>start</i> 4/10/2008	120000 gallons	<input checked="" type="checkbox"/> Capacity <input type="checkbox"/> Non-Capacity	<input type="checkbox"/> Bypass <input checked="" type="checkbox"/> SSO
	<i>stop</i> 4/10/2008		Arkansas River Flooding, Power outage	Restored power
<i>Location:</i>				

City of Alma, NPDES Permit AR0021466, Violation #1

It shall be unlawful for any person to violate any provisions of this chapter or of any rule, regulation, or order adopted by the Arkansas Pollution Control and Ecology Commission under this chapter or of a permit issued under this chapter -A.C.A § 8-4-217(a)(3). - *The Permittee has exceeded the effluent limits in Part I, Section A of the permit.*

DATE OF VIOLATION: Since July 2003, Paragraph 2 of Findings of Fact (treated as one violation)

Reg 7, Section 9 subpart	factors	range	points
A	The seriousness of the noncompliance and its effect on the environment, including the degree of potential or actual risk or harm to the public health caused by the violation.	0 to 15	6
	Violations of effluent limits are serious violations. Effluent limits are designed to be protective of the receiving stream. There are no indications that the violations have resulted in violations of water quality standards.		
B	Whether the cause of the noncompliance was an unavoidable accident.	-5 to 10	1
	Though the cause was not an unavoidable accident, the permittee attempted to address the noncompliance but was hindered by contractor disputes.		
C	The violator's cooperativeness and expeditious efforts to correct the violation.	0 to 10	3
	The permittee's noncompliance reports indicates it is attempting to correct the problem; however, most of the violations are ammonia nitrogen which have persisted during the summer months for three years. The permittee has been cooperative but not expeditious.		
D	The violator's history in taking all reasonable steps or procedures necessary or appropriate to correct any noncompliance.	0 to 10	3
	The permittee was cited for ammonia nitrogen violations in CAO LIS No. 03-076-001 but has been unable to achieve consistent compliance. Though the Permittee has been hindered by contractor disputes in correcting the problem, it should have pursued alternative solutions rather than allowing the noncompliance to persist .		
E	The violator's history of previous documented violations regardless of whether or not other administrative, civil, or criminal proceedings were commenced therefore.	0 to 10	5
	The City of Alma was issued CAO LIS No. 03-076 and 03-076-001 for previous ammonia nitrogen violations.		
F	Whether the cause of the violation was an intentional act or omission on the part of the violator.	0 to 15	0
	The violation appears to be an omission.		
G	Whether the noncompliance has resulted in an economic benefit or pecuniary gain to the violator , including but not limited to cost avoidance	0 to 10	0
	It does not appear that any economic benefit was received due to this violation.		
H	Whether the pursuit and the execution of the enforcement action has resulted in unusual or extraordinary costs to the Department or public.	0 to 10	0
	There were no unusual or extraordinary costs to the Department or public.		
I	Whether any part of the noncompliance is attributable to the action or inaction of the State government.	-5 to 0	0
	The noncompliance is not attributable to the action or inaction of the State government.		
J	Whether the violator has delayed corrective action.	0 to 10	3
	Though the permittee was hindered by contractor disputes in attempting to address the noncompliance, it should have taken corrective action sooner.		
POINT TOTAL			21

Total Points ÷100 X \$10,000 = Civil Penalty

\$2,100.00

City of Alma, NPDES Permit AR0021466, Violation #2

It shall be unlawful for any person to violate any provisions of this chapter or of any rule, regulation, or order adopted by the Arkansas Pollution Control and Ecology Commission under this chapter or of a permit issued under this chapter -A.C.A § 8-4-217(a)(3). *Proper Operation and Maintenance - The owner or operator 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 owner or operator to achieve compliance with the conditions of this permit. Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures. This provision requires the operation of backup or auxiliary facilities or similar systems which are installed by a owner or operator only when the operation is necessary to achieve compliance with the conditions of the permit. Part II, Section B, Paragraph 1 of the Permit.*

DATE OF VIOLATION: April 11, 2007, Paragraph 3a of Findings of Fact

Reg 7, Section 9 subpart	factors	range	points
A	The seriousness of the noncompliance and its effect on the environment, including the degree of potential or actual risk or harm to the public health caused by the violation.	0 to 15	6
	Improper operations and maintenance results in inefficient treatment increasing the level of pollutants discharged from the plant. It is suspected that insufficient aeration due to blowers not being operated has caused or contributed to the ammonia nitrogen violations.		
B	Whether the cause of the noncompliance was an unavoidable accident.	-5 to 10	2
	The cause of the noncompliance does not appear to be an unavoidable accident.		
C	The violator's cooperativeness and expeditious efforts to correct the violation.	0 to 10	0
	The permittee has indicated it is working to fix the problem.		
D	The violator's history in taking all reasonable steps or procedures necessary or appropriate to correct any noncompliance.	0 to 10	3
	The permittee was cited for ammonia nitrogen violations in CAO LIS No. 03-076-001 but has been unable to achieve consistent compliance. Though the Permittee has been hindered by contractor disputes in correcting the problem, it should have pursued alternative solutions rather than allowing the noncompliance to persist .		
E	The violator's history of previous documented violations regardless of whether or not other administrative, civil, or criminal proceedings were commenced therefore.	0 to 10	0
	The permittee does not have a history of this type of violation.		
F	Whether the cause of the violation was an intentional act or omission on the part of the violator.	0 to 15	0
	The violation appears to be an omission.		
G	Whether the noncompliance has resulted in an economic benefit or pecuniary gain to the violator , including but not limited to cost avoidance	0 to 10	0
	There may have been an economic benefit due to the failure to maintain the facilities. However, the exact cost benefit has not been determined.		
H	Whether the pursuit and the execution of the enforcement action has resulted in unusual or extraordinary costs to the Department or public.	0 to 10	0
	There were no unusual or extraordinary costs to the Department or public.		
I	Whether any part of the noncompliance is attributable to the action or inaction of the State government.	-5 to 0	0
	The noncompliance is not attributable to the action or inaction of the State government.		
J	Whether the violator has delayed corrective action.	0 to 10	1
	It does not appear that the permittee has substantially delayed corrective action.		
POINT TOTAL			12

Total Points +100 X \$10,000 = Civil Penalty

\$1,200.00

City of Alma, NPDES Permit AR0021466, Violation #3

It shall be unlawful for any person to violate any provisions of this chapter or of any rule, regulation, or order adopted by the Arkansas Pollution Control and Ecology Commission under this chapter or of a permit issued under this chapter -A.C.A § 8-4-217(a)(3). - *The Permittee was not recording the pH and temperature values when performing calibration of the pH meter. This is a violation of Part II, Section C, paragraph 3 and Part II, Section C, paragraphs 7 and 8 of the permit and the Permittee was not putting the name and address of the contract laboratory on the DMR as required by Part II, Section C, Paragraph 5 of the permit.*

DATE OF VIOLATION: April 11, 2007, Paragraphs 3b and 3c of Findings of Fact

Reg 7, Section 9 subpart	factors	range	points
A	The seriousness of the noncompliance and its effect on the environment, including the degree of potential or actual risk or harm to the public health caused by the violation.	0 to 15	1
	These are recordkeeping and monitoring violations and are not serious violations nor have these violations caused or contributed to any environmental or human health impact.		
B	Whether the cause of the noncompliance was an unavoidable accident.	-5 to 10	1
	The cause of the noncompliance does not appear to be an unavoidable accident.		
C	The violator's cooperativeness and expeditious efforts to correct the violation.	0 to 10	0
	The permittee has indicated the problem has been fixed.		
D	The violator's history in taking all reasonable steps or procedures necessary or appropriate to correct any noncompliance.	0 to 10	3
	The permittee was cited for ammonia nitrogen violations in CAO LIS No. 03-076-001 but has been unable to achieve consistent compliance. Though the Permittee has been hindered by contractor disputes in correcting the problem, it should have pursued alternative solutions rather than allowing the noncompliance to persist .		
E	The violator's history of previous documented violations regardless of whether or not other administrative, civil, or criminal proceedings were commenced therefore.	0 to 10	0
	The permittee does not have a history of this type of violation.		
F	Whether the cause of the violation was an intentional act or omission on the part of the violator.	0 to 15	0
	The violation appears to be an omission.		
G	Whether the noncompliance has resulted in an economic benefit or pecuniary gain to the violator , including but not limited to cost avoidance	0 to 10	0
	It does not appear that any economic benefit was received due to this violation.		
H	Whether the pursuit and the execution of the enforcement action has resulted in unusual or extraordinary costs to the Department or public.	0 to 10	0
	There were no unusual or extraordinary costs to the Department or public.		
I	Whether any part of the noncompliance is attributable to the action or inaction of the State government.	-5 to 0	0
	The noncompliance is not attributable to the action or inaction of the State government.		
J	Whether the violator has delayed corrective action.	0 to 10	0
	The permittee did not delay taking corrective action.		
POINT TOTAL			5

Total Points ÷ 100 X \$10,000 = Civil Penalty

\$500.00

City of Alma, NPDES Permit AR0021466, Violation #4 (formerly #6)

It shall be unlawful for any person to engage in any of the following acts without having first obtained a written permit from the commission to discharge sewage, industrial waste, or other wastes into any of the waters of this state. - A.C.A. § 8-4-217 (b)(1)(E). - **Sanitary Sewer Overflows**

DATE OF VIOLATION: All sanitary sewer overflows since August 2004 including those not reported, treated as one violation - Paragraph 6 of Findings of Fact

Reg 7, Section 9 subpart	factors	range	points
A	The seriousness of the noncompliance and its effect on the environment, including the degree of potential or actual risk or harm to the public health caused by the violation.	0 to 15	6
	Sanitary sewer overflows represent a significant potential to harm human health because of the discharge is untreated sewage. These are serious violations.		
B	Whether the cause of the noncompliance was an unavoidable accident.	-5 to 10	1
	The cause of the noncompliance does not appear to be an unavoidable accident.		
C	The violator's cooperativeness and expeditious efforts to correct the violation.	0 to 10	1
	The permittee has been working on addressing the causes of its sanitary sewer overflows. However, it appears these activities have been more reactive rather than comprehensive.		
D	The violator's history in taking all reasonable steps or procedures necessary or appropriate to correct any noncompliance.	-5 to 10	3
	The permittee was cited for ammonia nitrogen violations in CAO LIS No. 03-076-001 but has been unable to achieve consistent compliance. Though the Permittee has been hindered by contractor disputes in correcting the problem, it should have pursued alternative solutions rather than allowing the noncompliance to persist .		
E	The violator's history of previous documented violations regardless of whether or not other administrative, civil, or criminal proceedings were commenced therefore.	0 to 10	0
	The permittee has a history of SSOs.		
F	Whether the cause of the violation was an intentional act or omission on the part of the violator.	0 to 15	3
	The overflows are the result of an omission and could be avoided with a diligent maintenance program.		
G	Whether the noncompliance has resulted in an economic benefit or pecuniary gain to the violator , including but not limited to cost avoidance	0 to 10	0
	The City has probably received a significant economic benefit due to money saved that should have been spent in collection system system maintenance. However, the exact cost benefit has not been determined.		
H	Whether the pursuit and the execution of the enforcement action has resulted in unusual or extraordinary costs to the Department or public.	0 to 10	0
	No extraordinary or unusual costs were incurred.		
I	Whether any part of the noncompliance is attributable to the action or inaction of the State government.	-5 to 0	0
	The noncompliance was not caused by any action or inaction of ADEQ.		
J	Whether the violator has delayed corrective action.	0 to 10	2
	It appears the City has delayed taking effective corrective actions.		
POINT TOTAL			16

Total Points ÷100 X \$10,000 = Civil Penalty

\$1,600.00

Case Comprehensive Report

CAO	WN	Anne Roberts (Dennis Benson)	Closed/By	Atty:	
5736 Penalty Amt:	5,400.00	Start Date: 10/26/2007	Fiscal:	Bankrup	N
Total Paid:	0.00	Public Notice:	Legal:	Appeal	N
		Effective:	Enf:	Amendment	
		Executed:		Docket #	

-- no address data --

Events:

- AOO26 - Overflow to Dry Land or Building Backup
 - E0013 - Improper or Incorrect Reporting
 - C0018 - Improper Analysis or Lab Error
 - B0020 - Improper Operation and Maintenance
 - A0012 - Numeric Effluent Violation
-

PCS DMR VIOLATION REVIEW APRIL 2005 TO PRESENT
CITY OF ALMA - AR0021466

QL ***** QL

NPID	FNMS	MADI	FTYP	SIC2	TYPO	FLOW	RDF5	ENGI	RDF8	PEFD	PERE	STNO				
VDSG	MVDT	VLIM	VPRM	VPRM	VMLO	VSEA	VMOD	MQAV	MQMX	MCMN	MCAV	MCMX	MVIO			
AR0021466	ALMA, CITY OF		MAJOR MUNICIPAL	4952	PUB	1.75	3H	MJ	LITTLE	03/01/08	02/28/13	17-00059				
001A	04/30/05	3	SOLIDS, TOTAL	SUSPENDED	00530	1	0	0	2156.06		67.50	193.33	E90			
001A	05/31/05	3	SOLIDS, TOTAL	SUSPENDED	00530	1	0	0	97.32		31.85	47.67	E90			
001A	05/31/06	5	NITROGEN, AMMONIA	TOTAL (AS N)	00610	1	0	0	42.73		21.44	26.77	E90			
001A	05/31/06	5	COLIFORM, FECAL	GENERAL	74055	1	0	0			16.12	438.78	E90			
001A	06/30/06	5	NITROGEN, AMMONIA	TOTAL (AS N)	00610	1	0	0	74.15		17.67	21.10	E90			
001A	07/31/06	5	NITROGEN, AMMONIA	TOTAL (AS N)	00610	1	0	0	28.63		16.47	20.77	E90			
001A	08/31/06	5	NITROGEN, AMMONIA	TOTAL (AS N)	00610	1	0	0	26.03		16.34	23.27	E90			
001A	09/30/06	5	SOLIDS, TOTAL	SUSPENDED	00530	1	0	0	93.96		34.25	46.67	E90			
001A	09/30/06	5	NITROGEN, AMMONIA	TOTAL (AS N)	00610	1	0	0	28.28		10.58	16.85	E90			
001A	10/31/06	5	NITROGEN, AMMONIA	TOTAL (AS N)	00610	1	0	0	31.44		11.29	13.53	E90			
001A	05/31/07	5	NITROGEN, AMMONIA	TOTAL (AS N)	00610	1	0	0	24.04		9.83	15.83	E90			
001A	06/30/07	5	NITROGEN, AMMONIA	TOTAL (AS N)	00610	1	0	0	21		8.9	10.3	E90			
001A	07/31/07	5	NITROGEN, AMMONIA	TOTAL (AS N)	00610	1	0	0	13		5.7	6.9	E90			
001A	08/31/07	5	NITROGEN, AMMONIA	TOTAL (AS N)	00610	1	0	0	10.13		5.14	6.75	E90			
001A	09/30/07	5	NITROGEN, AMMONIA	TOTAL (AS N)	00610	1	0	0	17		4.2	8.9	E90			
001A	10/31/07	5	NITROGEN, AMMONIA	TOTAL (AS N)	00610	1	0	0	18		7.1	9.3	E90			
001A	03/31/08	5	OXYGEN, DISSOLVED	(DO)	00300	1	0	0					D20			

TOTAL QUICK LOOK PRINT LINES: 18

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY
 U.S. EPA PERMIT COMPLIANCE SYSTEM (PCS)
 REPORTED SAMPLE MEASUREMENTS APRIL 2005 THROUGH PRESENT
 FOR NPDES PERMIT NO. AR0021466 - CITY OF ALMA

QL ***** QL

FACILITY NAME SHORT PERMIT NUMBER RECEIVING WATERS FLOW RATE ISSUE DATE ST PRMT NUM

VIO DSCH/RPT DESIG VIO PRAM CD

QUANT UNIT CD

CONC UNIT CD

FREQ OF ANLYS

MEAS VIO DT MEAS QUANT AVG MEAS QUANT MAX MEAS CONC MIN MEAS CONC AVG MEAS CONC MAX MEAS VIO EVNT CD

NO DATA

ALMA, CITY OF AR0021466 ARKANSAS RV 1.75 01/31/08 17-00059

TX1S COEF OF VAR STATRE 48HR ACU D. PULEX

PER- CENT

SEMI- ANNUAL

06/30/05	0.0	MEASUREMENT ONLY, NO VIOLATION
12/31/05	0	MEASUREMENT ONLY, NO VIOLATION
06/30/06	0	MEASUREMENT ONLY, NO VIOLATION
12/31/06	0.0	MEASUREMENT ONLY, NO VIOLATION
06/30/07	12.1	MEASUREMENT ONLY, NO VIOLATION
12/31/07	18.7	MEASUREMENT ONLY, NO VIOLATION
06/30/08	0	MEASUREMENT ONLY, NO VIOLATION

SUB-TOTAL QUICK LOOK PRINT LINES: 10

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY
U.S. EPA PERMIT COMPLIANCE SYSTEM (PCS)
REPORTED SAMPLE MEASUREMENTS APRIL 2005 THROUGH PRESENT
FOR NPDES PERMIT NO. AR0021466 - CITY OF ALMA

QL ***** QL

FACILITY NAME SHORT PERMIT NUMBER RECEIVING WATERS FLOW RATE ISSUE DATE ST PRMT NUM

VIO DSCH/RPT DESIG VIO PRAM CD

QUANT UNIT CD

CONC UNIT CD

FREQ OF ANLYS

MEAS VIO DT MEAS QUANT AVG MEAS QUANT MAX MEAS CONC MIN MEAS CONC AVG MEAS CONC MAX MEAS VIO EVNT CD

NO DATA

TX1S

COEF OF VAR STATRE 48HR ACU PIMEPHALES

PER- CENT

SEMI- ANNUAL

06/30/05		0.0		MEASUREMENT ONLY, NO VIOLATION
12/31/05		0		MEASUREMENT ONLY, NO VIOLATION
06/30/06		0		MEASUREMENT ONLY, NO VIOLATION
12/31/06		0.0		MEASUREMENT ONLY, NO VIOLATION
06/30/07		0		MEASUREMENT ONLY, NO VIOLATION
12/31/07		0.00		MEASUREMENT ONLY, NO VIOLATION
06/30/08		5.7		MEASUREMENT ONLY, NO VIOLATION

SUB-TOTAL QUICK LOOK PRINT LINES: 9

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY
U.S. EPA PERMIT COMPLIANCE SYSTEM (PCS)
REPORTED SAMPLE MEASUREMENTS APRIL 2005 THROUGH PRESENT
FOR NPDES PERMIT NO. AR0021466 - CITY OF ALMA

QL ***** QL

FACILITY NAME SHORT PERMIT NUMBER RECEIVING WATERS FLOW RATE ISSUE DATE ST PRMT NUM

VIO DSCH/RPT DESIG VIO PRAM CD

QUANT UNIT CD

CONC UNIT CD

FREQ OF ANLYS

MEAS VIO DT MEAS QUANT AVG MEAS QUANT MAX MEAS CONC MIN MEAS CONC AVG MEAS CONC MAX MEAS VIO EVNT CD

NO DATA

TX1S

LF P/F STATRE 48HR ACU PIMEPHALES PROMEL

PASS=0FAIL=1

SEMI- ANNUAL

06/30/05	0	MEASUREMENT ONLY, NO VIOLATION
12/31/05	0	MEASUREMENT ONLY, NO VIOLATION
06/30/06	0	MEASUREMENT ONLY, NO VIOLATION
12/31/06	0	MEASUREMENT ONLY, NO VIOLATION
06/30/07	0	MEASUREMENT ONLY, NO VIOLATION
12/31/07	0	MEASUREMENT ONLY, NO VIOLATION
06/30/08	0	MEASUREMENT ONLY, NO VIOLATION

SUB-TOTAL QUICK LOOK PRINT LINES: 9

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY
U.S. EPA PERMIT COMPLIANCE SYSTEM (PCS)
REPORTED SAMPLE MEASUREMENTS APRIL 2005 THROUGH PRESENT
FOR NPDES PERMIT NO. AR0021466 - CITY OF ALMA

QL ***** QL

FACILITY NAME SHORT PERMIT NUMBER RECEIVING WATERS FLOW RATE ISSUE DATE ST PRMT NUM

VIO DSCH/RPT DESIG VIO PRAM CD

QUANT UNIT CD

CONC UNIT CD

FREQ OF ANLYS

MEAS VIO DT MEAS QUANT AVG MEAS QUANT MAX MEAS CONC MIN MEAS CONC AVG MEAS CONC MAX MEAS VIO EVNT CD

NO DATA

TX1S

NOEL LETHAL STATRE 48HR ACU D. PULEX

PER- CENT

SEMI- ANNUAL

06/30/05	17	MEASUREMENT ONLY, NO VIOLATION
12/31/05	10	MEASUREMENT ONLY, NO VIOLATION
06/30/06	17	MEASUREMENT ONLY, NO VIOLATION
12/31/06	17	MEASUREMENT ONLY, NO VIOLATION
06/30/07	17	MEASUREMENT ONLY, NO VIOLATION
12/31/07	17	MEASUREMENT ONLY, NO VIOLATION
06/30/08	17	MEASUREMENT ONLY, NO VIOLATION

SUB-TOTAL QUICK LOOK PRINT LINES: 9

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY
 U.S. EPA PERMIT COMPLIANCE SYSTEM (PCS)
 REPORTED SAMPLE MEASUREMENTS APRIL 2005 THROUGH PRESENT
 FOR NPDES PERMIT NO. AR0021466 - CITY OF ALMA

QL ***** QL

FACILITY NAME SHORT PERMIT NUMBER RECEIVING WATERS FLOW RATE ISSUE DATE ST PRMT NUM

VIO DSCH/RPT DESIG VIO PRAM CD

QUANT UNIT CD

CONC UNIT CD

FREQ OF ANLYS

MEAS VIO DT MEAS QUANT AVG MEAS QUANT MAX MEAS CONC MIN MEAS CONC AVG MEAS CONC MAX MEAS VIO EVNT CD

NO DATA

TX1S

NOEL LETHAL STATRE 48HR ACU PIMEPHALES

PER- CENT

SEMI- ANNUAL

06/30/05		17	MEASUREMENT ONLY, NO VIOLATION
12/31/05		17	MEASUREMENT ONLY, NO VIOLATION
06/30/06		17	MEASUREMENT ONLY, NO VIOLATION
12/31/06		17	MEASUREMENT ONLY, NO VIOLATION
06/30/07		17	MEASUREMENT ONLY, NO VIOLATION
12/31/07		17	MEASUREMENT ONLY, NO VIOLATION
06/30/08		17	MEASUREMENT ONLY, NO VIOLATION

SUB-TOTAL QUICK LOOK PRINT LINES: 9

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY
 U.S. EPA PERMIT COMPLIANCE SYSTEM (PCS)
 REPORTED SAMPLE MEASUREMENTS APRIL 2005 THROUGH PRESENT
 FOR NPDES PERMIT NO. AR0021466 - CITY OF ALMA

QL ***** QL

FACILITY NAME SHORT PERMIT NUMBER RECEIVING WATERS FLOW RATE ISSUE DATE ST PRMT NUM

VIO DSCH/RPT DESIG VIO PRAM CD

QUANT UNIT CD CONC UNIT CD FREQ OF ANLYS

MEAS VIO DT MEAS QUANT AVG MEAS QUANT MAX MEAS CONC MIN MEAS CONC AVG MEAS CONC MAX MEAS VIO EVNT CD

NO DATA

001A	COLIFORM, FECAL	GENERAL	#/	100ML	THREE/ WEEK
04/30/05			91.57	204.17	MEASUREMENT ONLY, NO VIOLATION
05/31/05			35.60	60.73	MEASUREMENT ONLY, NO VIOLATION
06/30/05			39.97	104.83	MEASUREMENT ONLY, NO VIOLATION
07/31/05			27.73	58.88	MEASUREMENT ONLY, NO VIOLATION
08/31/05			34.53	102.05	MEASUREMENT ONLY, NO VIOLATION
09/30/05			31.75	148.52	MEASUREMENT ONLY, NO VIOLATION
10/31/05			2.38	51.79	MEASUREMENT ONLY, NO VIOLATION
11/30/05			72.54	220.15	MEASUREMENT ONLY, NO VIOLATION
12/31/05			25.93	75.80	MEASUREMENT ONLY, NO VIOLATION
01/31/06			6.75	32.93	MEASUREMENT ONLY, NO VIOLATION
02/28/06			64.74	85.37	MEASUREMENT ONLY, NO VIOLATION
03/31/06			46.44	100.79	MEASUREMENT ONLY, NO VIOLATION
04/30/06			38.10	219.79	MEASUREMENT ONLY, NO VIOLATION
05/31/06			16.12	438.78	NUMERIC VIOLATION
06/30/06			55.62	97.72	MEASUREMENT ONLY, NO VIOLATION
07/31/06			181.20	331.07	MEASUREMENT ONLY, NO VIOLATION
08/31/06			67.39	210.68	MEASUREMENT ONLY, NO VIOLATION
09/30/06			55.28	179.42	MEASUREMENT ONLY, NO VIOLATION
10/31/06			86.78	250.47	MEASUREMENT ONLY, NO VIOLATION
11/30/06			364.58	690.06	MEASUREMENT ONLY, NO VIOLATION
12/31/06			105.31	574.50	MEASUREMENT ONLY, NO VIOLATION
01/31/07			49.74	305.04	MEASUREMENT ONLY, NO VIOLATION
02/28/07			35.26	75.93	MEASUREMENT ONLY, NO VIOLATION
03/31/07			29.87	144.99	MEASUREMENT ONLY, NO VIOLATION
04/30/07			33	119	MEASUREMENT ONLY, NO VIOLATION
05/31/07			11.32	63.16	MEASUREMENT ONLY, NO VIOLATION
06/30/07			5	12	MEASUREMENT ONLY, NO VIOLATION
07/31/07			68	315	MEASUREMENT ONLY, NO VIOLATION
08/31/07			62.34	65.46	MEASUREMENT ONLY, NO VIOLATION
09/30/07			45	70	MEASUREMENT ONLY, NO VIOLATION
10/31/07			18	132	MEASUREMENT ONLY, NO VIOLATION
11/30/07			5	9	MEASUREMENT ONLY, NO VIOLATION
12/31/07			13	111	MEASUREMENT ONLY, NO VIOLATION
01/31/08			30	72	MEASUREMENT ONLY, NO VIOLATION

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY
 U.S. EPA PERMIT COMPLIANCE SYSTEM (PCS)
 REPORTED SAMPLE MEASUREMENTS APRIL 2005 THROUGH PRESENT
 FOR NPDES PERMIT NO. AR0021466 - CITY OF ALMA

QL ***** QL

FACILITY NAME SHORT	PERMIT NUMBER	RECEIVING WATERS	FLOW RATE	ISSUE DATE	ST PRMT NUM
---------------------	---------------	------------------	-----------	------------	-------------

VIO DSCH/RPT DESIG	VIO PRAM CD
--------------------	-------------

QUANT UNIT CD

CONC UNIT CD

FREQ OF ANLYS

MEAS VIO DT	MEAS QUANT AVG	MEAS QUANT MAX	MEAS CONC MIN	MEAS CONC AVG	MEAS CONC MAX	MEAS VIO EVNT CD
-------------	----------------	----------------	---------------	---------------	---------------	------------------

NO DATA

02/29/08						
03/31/08						

252
53

459
256

MEASUREMENT ONLY, NO VIOLATION
MEASUREMENT ONLY, NO VIOLATION

SUB-TOTAL QUICK LOOK PRINT LINES: 38

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY
 U.S. EPA PERMIT COMPLIANCE SYSTEM (PCS)
 REPORTED SAMPLE MEASUREMENTS APRIL 2005 THROUGH PRESENT
 FOR NPDES PERMIT NO. AR0021466 - CITY OF ALMA

QL ***** QL

FACILITY NAME SHORT PERMIT NUMBER RECEIVING WATERS FLOW RATE ISSUE DATE ST PRMT NUM

VIO DSCH/RPT DESIG VIO PRAM CD

QUANT UNIT CD CONC UNIT CD FREQ OF ANLYS

MEAS VIO DT MEAS QUANT AVG MEAS QUANT MAX MEAS CONC MIN MEAS CONC AVG MEAS CONC MAX MEAS VIO EVNT CD

NO DATA

001A	BOD, CARBONACEOUS LBS/DY	05 DAY, 20C	MG/L	THREE/ WEEK	
05/31/05	47.77		15.92	22.0	MEASUREMENT ONLY, NO VIOLATION
06/30/05	35.99		15.21	28.67	MEASUREMENT ONLY, NO VIOLATION
07/31/05	8.03		4.75	14.00	MEASUREMENT ONLY, NO VIOLATION
08/31/05	10.94		5.73	6.33	MEASUREMENT ONLY, NO VIOLATION
09/30/05	9.79		4.42	7.33	MEASUREMENT ONLY, NO VIOLATION
10/31/05	6.59		3.67	5.67	MEASUREMENT ONLY, NO VIOLATION
05/31/06	15.56		8.57	15.33	MEASUREMENT ONLY, NO VIOLATION
06/30/06	16.64		5.15	6.00	MEASUREMENT ONLY, NO VIOLATION
07/31/06	6.49		3.92	6.00	MEASUREMENT ONLY, NO VIOLATION
08/31/06	15.06		8.40	10.00	MEASUREMENT ONLY, NO VIOLATION
09/30/06	37.98		14.25	18.67	MEASUREMENT ONLY, NO VIOLATION
10/31/06	28.71		11.43	17.00	MEASUREMENT ONLY, NO VIOLATION
05/31/07	15.88		7.00	10.67	MEASUREMENT ONLY, NO VIOLATION
06/30/07	11		4.6	7.3	MEASUREMENT ONLY, NO VIOLATION
07/31/07	6		2.7	3.3	MEASUREMENT ONLY, NO VIOLATION
08/31/07	5.78		2.85	3.67	MEASUREMENT ONLY, NO VIOLATION
09/30/07	12		3.3	4.0	MEASUREMENT ONLY, NO VIOLATION
10/31/07	8		3.2	5.0	MEASUREMENT ONLY, NO VIOLATION

SUB-TOTAL QUICK LOOK PRINT LINES: 20

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY
 U.S. EPA PERMIT COMPLIANCE SYSTEM (PCS)
 REPORTED SAMPLE MEASUREMENTS APRIL 2005 THROUGH PRESENT
 FOR NPDES PERMIT NO. AR0021466 - CITY OF ALMA

QL ***** QL

FACILITY NAME SHORT PERMIT NUMBER RECEIVING WATERS FLOW RATE ISSUE DATE ST PRMT NUM

VIO DSCH/RPT DESIG VIO PRAM CD

QUANT UNIT CD CONC UNIT CD FREQ OF ANLYS

MEAS VIO DT MEAS QUANT AVG MEAS QUANT MAX MEAS CONC MIN MEAS CONC AVG MEAS CONC MAX MEAS VIO EVNT CD

NO DATA

001A	BOD, 5-DAY LBS/DY	(20 DEG. C)	MG/L	THREE/ WEEK	
04/30/05	100.27		11.42	19.33	MEASUREMENT ONLY, NO VIOLATION
11/30/05	16.51		8.80	10.33	MEASUREMENT ONLY, NO VIOLATION
12/31/05	35.21		23.42	33.67	MEASUREMENT ONLY, NO VIOLATION
01/31/06	12.47		11.21	15.33	MEASUREMENT ONLY, NO VIOLATION
02/28/06	28.73		23.25	34.00	MEASUREMENT ONLY, NO VIOLATION
03/31/06	34.47		19.23	30.00	MEASUREMENT ONLY, NO VIOLATION
04/30/06	35.97		22.33	33.00	MEASUREMENT ONLY, NO VIOLATION
11/30/06	49.26		15.08	19.33	MEASUREMENT ONLY, NO VIOLATION
12/31/06	41.73		14.08	28.67	MEASUREMENT ONLY, NO VIOLATION
01/31/07	26.53		7.33	8.00	MEASUREMENT ONLY, NO VIOLATION
02/28/07	23.74		8.75	8.67	MEASUREMENT ONLY, NO VIOLATION
03/31/07	30.66		11.83	12.33	MEASUREMENT ONLY, NO VIOLATION
04/30/07	36.7		17.3	29.0	MEASUREMENT ONLY, NO VIOLATION
11/30/07	23		11.4	12.7	MEASUREMENT ONLY, NO VIOLATION
12/31/07	38.39		12.2	15.7	MEASUREMENT ONLY, NO VIOLATION
01/31/08	32		12.2	15.3	MEASUREMENT ONLY, NO VIOLATION
02/29/08	79		24.2	37.0	MEASUREMENT ONLY, NO VIOLATION
03/31/08	44.3		12.9	16.7	MEASUREMENT ONLY, NO VIOLATION

SUB-TOTAL QUICK LOOK PRINT LINES: 20

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY
 U.S. EPA PERMIT COMPLIANCE SYSTEM (PCS)
 REPORTED SAMPLE MEASUREMENTS APRIL 2005 THROUGH PRESENT
 FOR NPDES PERMIT NO. AR0021466 - CITY OF ALMA

QL ***** QL

FACILITY NAME SHORT PERMIT NUMBER RECEIVING WATERS FLOW RATE ISSUE DATE ST PRMT NUM

VIO DSCH/RPT DESIG VIO PRAM CD

QUANT UNIT CD CONC UNIT CD FREQ OF ANLYS

MEAS VIO DT MEAS QUANT AVG MEAS QUANT MAX MEAS CONC MIN MEAS CONC AVG MEAS CONC MAX MEAS VIO EVNT CD

NO DATA

001A	CHLORINE, TOTAL	RESIDUAL	MG/L	THREE/ WEEK	
04/30/05			0.40	0.50	MEASUREMENT ONLY, NO VIOLATION
05/31/05			0.33	0.37	MEASUREMENT ONLY, NO VIOLATION
06/30/05			0.35	0.60	MEASUREMENT ONLY, NO VIOLATION
07/31/05			0.41	0.56	MEASUREMENT ONLY, NO VIOLATION
08/31/05			0.29	0.53	MEASUREMENT ONLY, NO VIOLATION
09/30/05			0.35	0.51	MEASUREMENT ONLY, NO VIOLATION
10/31/05			0.66	1.30	MEASUREMENT ONLY, NO VIOLATION
11/30/05				0.04	MEASUREMENT ONLY, NO VIOLATION
12/31/05				0.04	MEASUREMENT ONLY, NO VIOLATION
01/31/06				0.04	MEASUREMENT ONLY, NO VIOLATION
02/28/06				0.08	MEASUREMENT ONLY, NO VIOLATION
03/31/06				0.04	MEASUREMENT ONLY, NO VIOLATION
04/30/06				0.04	MEASUREMENT ONLY, NO VIOLATION
05/31/06				0.01	MEASUREMENT ONLY, NO VIOLATION
06/30/06				0.04	MEASUREMENT ONLY, NO VIOLATION
07/31/06				0.04	MEASUREMENT ONLY, NO VIOLATION
08/31/06				0.05	MEASUREMENT ONLY, NO VIOLATION
09/30/06				0.03	MEASUREMENT ONLY, NO VIOLATION
10/31/06				0.05	MEASUREMENT ONLY, NO VIOLATION
11/30/06				0.07	MEASUREMENT ONLY, NO VIOLATION
12/31/06				0.06	MEASUREMENT ONLY, NO VIOLATION
01/31/07				0.08	MEASUREMENT ONLY, NO VIOLATION
02/28/07				0.06	MEASUREMENT ONLY, NO VIOLATION
03/31/07				0.06	MEASUREMENT ONLY, NO VIOLATION
04/30/07				0.05	MEASUREMENT ONLY, NO VIOLATION
05/31/07				0.03	MEASUREMENT ONLY, NO VIOLATION
06/30/07				0.03	MEASUREMENT ONLY, NO VIOLATION
07/31/07				0.05	MEASUREMENT ONLY, NO VIOLATION
08/31/07				0.08	MEASUREMENT ONLY, NO VIOLATION
09/30/07				0.05	MEASUREMENT ONLY, NO VIOLATION
10/31/07				0.07	MEASUREMENT ONLY, NO VIOLATION
11/30/07				0.04	MEASUREMENT ONLY, NO VIOLATION
12/31/07				0.05	MEASUREMENT ONLY, NO VIOLATION
01/31/08				0.08	MEASUREMENT ONLY, NO VIOLATION

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY
U.S. EPA PERMIT COMPLIANCE SYSTEM (PCS)
REPORTED SAMPLE MEASUREMENTS APRIL 2005 THROUGH PRESENT
FOR NPDES PERMIT NO. AR0021466 - CITY OF ALMA

QL ***** QL

FACILITY NAME SHORT PERMIT NUMBER RECEIVING WATERS FLOW RATE ISSUE DATE ST PRMT NUM

VIO DSCH/RPT DESIG VIO PRAM CD

QUANT UNIT CD

CONC UNIT CD

FREQ OF ANLYS

MEAS VIO DT MEAS QUANT AVG MEAS QUANT MAX MEAS CONC MIN MEAS CONC AVG MEAS CONC MAX MEAS VIO EVNT CD

NO DATA

02/29/08
03/31/08

0.05 MEASUREMENT ONLY, NO VIOLATION
0.05 MEASUREMENT ONLY, NO VIOLATION

SUB-TOTAL QUICK LOOK PRINT LINES: 38

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY
 U.S. EPA PERMIT COMPLIANCE SYSTEM (PCS)
 REPORTED SAMPLE MEASUREMENTS APRIL 2005 THROUGH PRESENT
 FOR NPDES PERMIT NO. AR0021466 - CITY OF ALMA

QL ***** QL

FACILITY NAME SHORT PERMIT NUMBER RECEIVING WATERS FLOW RATE ISSUE DATE ST PRMT NUM

VIO DSCH/RPT DESIG VIO PRAM CD

QUANT UNIT CD

CONC UNIT CD

FREQ OF ANLYS

MEAS VIO DT MEAS QUANT AVG MEAS QUANT MAX MEAS CONC MIN MEAS CONC AVG MEAS CONC MAX MEAS VIO EVNT CD

NO DATA

001A FLOW, IN CONDUIT OR THRU TREATMENT PLANT
 MGD

DAILY

04/30/05	1.562	7.392	MEASUREMENT ONLY, NO VIOLATION
05/31/05	1.301	2.671	MEASUREMENT ONLY, NO VIOLATION
06/30/05	1.136	1.997	MEASUREMENT ONLY, NO VIOLATION
07/31/05	0.862	1.659	MEASUREMENT ONLY, NO VIOLATION
08/31/05	1.083	2.237	MEASUREMENT ONLY, NO VIOLATION
09/30/05	1.154	2.955	MEASUREMENT ONLY, NO VIOLATION
10/31/05	0.940	1.646	MEASUREMENT ONLY, NO VIOLATION
11/30/05	1.006	1.419	MEASUREMENT ONLY, NO VIOLATION
12/31/05	0.854	1.347	MEASUREMENT ONLY, NO VIOLATION
01/31/06	0.737	2.158	MEASUREMENT ONLY, NO VIOLATION
02/28/06	0.697	1.111	MEASUREMENT ONLY, NO VIOLATION
03/31/06	1.287	4.751	MEASUREMENT ONLY, NO VIOLATION
04/30/06	1.285	5.564	MEASUREMENT ONLY, NO VIOLATION
05/31/06	1.351	8.178	MEASUREMENT ONLY, NO VIOLATION
06/30/06	1.327	7.514	MEASUREMENT ONLY, NO VIOLATION
07/31/06	0.844	1.452	MEASUREMENT ONLY, NO VIOLATION
08/31/06	1.074	1.893	MEASUREMENT ONLY, NO VIOLATION
09/30/06	2.122	7.082	MEASUREMENT ONLY, NO VIOLATION
10/31/06	1.503	6.565	MEASUREMENT ONLY, NO VIOLATION
11/30/06	2.755	16.752	MEASUREMENT ONLY, NO VIOLATION
12/31/06	1.879	8.174	MEASUREMENT ONLY, NO VIOLATION
01/31/07	2.722	12.757	MEASUREMENT ONLY, NO VIOLATION
02/28/07	1.755	6.399	MEASUREMENT ONLY, NO VIOLATION
03/31/07	1.365	1.669	MEASUREMENT ONLY, NO VIOLATION
04/30/07	1.072	1.590	MEASUREMENT ONLY, NO VIOLATION
05/31/07	1.098	1.733	MEASUREMENT ONLY, NO VIOLATION
06/30/07	1.082	2.008	MEASUREMENT ONLY, NO VIOLATION
07/31/07	1.417	5.436	MEASUREMENT ONLY, NO VIOLATION
08/31/07	2.281	19.195	MEASUREMENT ONLY, NO VIOLATION
09/30/07	1.412	7.146	MEASUREMENT ONLY, NO VIOLATION
10/31/07	1.589	8.830	MEASUREMENT ONLY, NO VIOLATION
11/30/07	0.921	1.277	MEASUREMENT ONLY, NO VIOLATION
12/31/07	1.422	2.470	MEASUREMENT ONLY, NO VIOLATION
01/31/08	1.264	1.590	MEASUREMENT ONLY, NO VIOLATION

City of Alma
Summary of Flow Monitoring

August-04	1.463	2.068
September-04	1.315	1.797
October-04	1.431	7.154
November-04	2.492	10.293
December-04	1.623	4.483
January-05	2.271	13.42
February-05	1.222	1.938
March-05	1.358	3.113
April-05	1.562	7.392
May-05	1.301	2.671
June-05	1.136	1.997
July-05	0.862	1.659
August-05	1.083	2.237
September-05	1.154	2.955
October-05	0.94	1.646
November-05	1.006	1.419
December-05	0.854	1.347
January-06	0.737	2.158
February-06	0.697	1.111
March-06	1.287	4.751
April-06	1.285	5.564
May-06	1.351	8.178
June-06	1.327	7.514
July-06	0.844	1.452
August-06	1.074	1.893
September-06	2.122	7.082
October-06	1.503	6.565
November-06	2.755	16.752
December-06	1.879	8.174
January-07	2.722	12.757
February-07	1.755	6.399
March-07	1.365	1.669
April-07	1.072	1.59
May-07	1.098	1.733
June-07	1.082	2.008
July-07	1.417	5.436
August-07	2.281	19.195
AVG	1.425027	5.123514
% of Design	81.4%	292.8%

ADEQ

ARKANSAS
Department of Environmental Quality

May 4, 2007

Mark Yardley, Public Works Director
City of Alma
811 Fayetteville Ave.
Alma, AR 72921

Re: AFIN: 17-00059

NPDES Permit No. AR0021466

Dear Mr. Yardley:

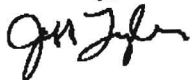
On April 11, 2007, I performed a routine permit compliance inspection of your facility in accordance with the provisions of the federal Clean Water Act, the Arkansas Water and Air Pollution Control Act and the regulations promulgated thereunder. This inspection revealed the following violations:

1. At time of inspection, four blowers in the initial cell were not in operation. According to the operator, the plant has experienced on-going problems with the blowers since installation. Efforts must be made to ensure that all blowers are functioning properly within the treatment system.
2. The facility operator is not recording the pH values and temperature when performing calibration on the meter. This information is needed in order to verify the accuracy of the meter.
3. During the inspection, Discharge Monitoring Reports (October-November 2006) were reviewed. The contract lab's name was not indicated on the reports as required by the permit.
4. The facility is currently not collecting a grab sample when monitoring for pH. Current protocol requires the operator to lower the pH meter below the weir and monitoring during flow. It appears that this procedure does not meet the definition of a "grab sample" as stated in the permit.

The violations require your immediate attention. Please submit a written response to these findings to the Enforcement Branch of this Department. This response should contain documentation describing the course of action taken to correct each item noted. This corrective action should be completed as soon as possible and the written response is due by May 25, 2007.

If you have any questions regarding this inspection, please contact me at 479-452-4822 ext. 11

Sincerely,



Jeff Tyler
District Field Inspector
Water Division

cc: Enforcement Branch
Permit Branch

SECTION A - PERMIT VERIFICATION

- PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS DETAILS: S M U NA (FURTHER EXPLANATION ATTACHED No.)
1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE Y N NA
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES Y N NA
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT Y N NA
4. ALL DISCHARGES ARE PERMITTED Y N NA

SECTION B - RECORDKEEPING AND REPORTING EVALUATION

- RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT. DETAILS: S M U NA (FURTHER EXPLANATION ATTACHED (No.) **Contract lab's name is not indicated on DMR's from October-December 2006.**)
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 NA
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA. Y N NA

SECTION C - OPERATIONS AND MAINTENANCE

- TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED. DETAILS: S M U NA (FURTHER EXPLANATION ATTACHED (No.) **During inspection it was noted that four blowers in the initial cell were not in operation.**)
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. **(Retention ponds)** 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. **(1-Class III and 1-Class I)** S M U NA
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED. S M U NA
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE. Y N NA
 STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED. Y N NA
 PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED. Y N NA

SECTION C - OPERATIONS AND MAINTENANCE (CONT'D)

9. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR? Y N NA
 IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED? Y N NA
 HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS? Y N NA
10. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT? Y N NA
 IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT? Y N NA

SECTION D - SAMPLING

PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS. S M U NA (FURTHER EXPLANATION ATTACHED (No.)).
 DETAILS: **Facility is not collecting a grab sample when monitoring for pH. They check pH insitu, below the weir.**

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 3- rectangular weir end contractions
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED. Y N NA
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED. Y N NA
4. CALIBRATION FREQUENCY ADEQUATE. (DATE OF LAST CALIBRATION 02-10-07) Y N NA
 RECORDS MAINTAINED OF CALIBRATION PROCEDURES. Y N NA
 CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE. (1 per month) 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: **Facility operator not recording pH values and temperature at time of calibration.**

1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(b) FOR SLUDGES) Y N NA

SECTION F - LABORATORY (CONT'D)

- 2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED Y N NA
- 3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT. S M U NA
- 4. QUALITY CONTROL PROCEDURES ADEQUATE. S M U NA
- 5. DUPLICATE SAMPLES ARE ANALYZED. 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 Data Testing American Interplex
 LAB ADDRESS 3434 Country Club Fort Smith AR 72903 8600 Kanis Rd Little Rock, AR 72204-2322
 PARAMETERS PERFORMED TSS, CBOD, Fecal Col Biomonitoring

SECTION G - EFFLUENT/RECEIVING WATERS OBSERVATIONS. S M U NA (FURTHER EXPLANATION ATTACHED No).

Based on visual observations only.

OUTFALL NO.	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOAT SOL.	COLOR	OTHER
001	None	None	Light	Trace	Light	Very light brown	

Comments: **Receiving waters observed at AR River appeared satisfactory.**

SECTION H - SLUDGE DISPOSAL

SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS. S M U NA (FURTHER EXPLANATION ATTACHED (No)).
 DETAILS: **Lagoon system, no sludge has been removed.**

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

SECTION I - SAMPLING INSPECTION PROCEDURES (FURTHER EXPLANATION ATTACHED No).

- 1. SAMPLES OBTAINED THIS INSPECTION. Y N NA
- 2. TYPE OF SAMPLE OBTAINED
 GRAB NA COMPOSITE SAMPLE NA METHOD NA 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: April 11, 2007 Time: 1400

Head in feet = .31 ft

Type & Size of Primary Flow Measurement Device 3' Rectangular Weir with end contractions

Name & Model of Secondary Flow Measurement Device: Millitronics OCM 3

Recorded Flow at date & time listed above: 1.088 mgd

*Flows are calculated from flow charts taken from the ISCO Open Channel Flow Measurement Handbook
5th Edition see Table # 10-5*

.31ft = 1.091 mgd

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

% error = $\frac{1.088 - 1.091}{1.091} \times 100$

% error = -0.003 x 100

% error = -0.3

DMR Calculation Check

Reporting Period: From December 01, 2006 - December 31, 2006

Parameter Checked: TSS

	Loading	Concentration	
	Mass	Monthly	
	Monthly Avg. (lbs/ day)	Avg.-Mg/l	7- day Avg- Mg/l
Reported Value:	71.19	22.92	31.33
Calculated Value:	71.19	22.33	31.33
Permit Value:	438	30	45

If calculated value does not equal reported value, explain: Variance due to rounding or significant figures.

ADEQ

ARKANSAS
Department of Environmental Quality

December 12, 2007

Mark Yardley, Public Works Director
City of Alma
811 Fayetteville Ave.
Alma, AR 72921

AFIN: 17-00059

NPDES Permit No.: AR0021466

Dear Mr. Yardley:

On November 16, 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 the following violations:

1. The plant is experiencing on going problems with the blowers in pond two. At time of inspection, five blowers were not in operation. According to the operator mechanical issues appear to be the source of the persistent problems with these treatment units. Steps must be taken to ensure that all needed blowers are in service and functioning properly.
2. After reviewing the July 2007 Discharge Monitoring Report, a permit excursion was noted in regard to the monthly average concentration on Ammonia Nitrogen. Facility reported 5.7 mg/l, while the permit limit is 5.0 mg/l. Although this violation was reported to the Department, the facility must take all reasonable measures to eliminate any future permit excursions.

Also noted during the inspection was the on going construction in regard to the ponds and the elimination of the overland system at the plant. Once construction is completed, please notify my office.

The above items require your immediate attention. Please submit a written response to these findings to the Water Division Enforcement Section of this Department.

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

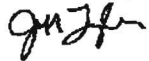
This response should contain detailed documentation describing the course of action taken to correct the items noted. This corrective action should be completed as soon as possible, and the written response is due by December 28, 2007.

Yardley, City of Alma
December 12, 2007
Page 2

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 479-452-4822 ext. 11.

Sincerely,



Jeff Tyler
District 4 Field Inspector
Water Division

cc: Water Division Enforcement Branch
Water Division Permits Branch



Form Approved
OMB No. 2040-0003

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

NPDES Compliance Inspection Report

Section A: National Data System Coding

Transaction Code			NPDES										Yr/Mo/Day					Inspec. Type	Inspector	Fac. Type									
1	N	2	5	3	A	R	0	0	2	1	4	6	6	11	12	0	7	1	1	1	6	17	18	C	19	S	20	1	
Remarks																													
A F I N 1 7 - 0 0 0 5 9																													
Inspection Work Days						Facility Evaluation Rating						BI		QA		Reserved													
67	0	0	1	69	70	3	71	N	72	N	73		74	75															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) City of Alma POTW 2500 Orrick Road Alma, AR 72921		Entry Time/Date 0900 / November 16, 2007	Permit Effective Date November 01, 2007
		Exit Time/Date 1530 / November 16, 2007	Permit Expiration Date October 31, 2007
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Tony Maxwell / Chief Operator, / 479-632-2267 / cell 479-285-0370		Other Facility Data Coordinates: Outfall 001 N 35°26'43" W 94°09'33"	
Name, Address of Responsible Official/Title/Phone and Fax Number Mark Yardley / Public Works Director / 479-632-2254 / fax 479-632-5136 811 Fayetteville Ave. Alma, AR 72921		Contacted Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	

Section C: Areas Evaluated During Inspection

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

S	Permit	S	Flow Measurement	U	Operations & Maintenance	S	Sampling
S	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	N	Other:

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

Section C-Operations and Maintenance- On-going problems exist with blowers in pond two. On date of inspection, five blowers were not in operation due to mechanical problems.

After reviewing July 2007 Discharge Monitoring Report, a permit excursion was noted in regard to the monthly average concentration of Ammonia Nitrogen. Facility reported 5.7mg/l, permit limit is 5.0mg/l. The Department was notified in regard to this violation.

On-going construction is being performed at the plant in regard to the treatment system. Existing ponds are being dug out and the overland system is being eliminated. The ponds will be introduced into the treatment process. Currently ponds are used for storage during rainfall events. Once improvements are completed the facility feels as if they will be able to meet permit limits on a consistent basis.

Name(s) and Signature(s) of Inspector(s) Jeff Tyler	Agency/Office/Telephone/Fax AR Dept. of Environmental Quality-/Ft. Smith/ 479-452-4822 ext. 11 / 479-452-4827	Date December 6, 2007
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date

SECTION A: PERMIT VERIFICATION

PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS

S M U NA 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 |

SECTION B: RECORDKEEPING AND REPORTING EVALUATION

RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT

S M U NA NEDETAILS: **Permit excursion was noted in regard to monthly average concentration of NH3-N (July 2007)**

- | | |
|--|---|
| 1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE: | <input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE |
| a. DATES AND TIME(S) OF SAMPLING: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| b. EXACT LOCATION(S) OF SAMPLING: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| c. NAME OF INDIVIDUAL PERFORMING SAMPLING: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| d. ANALYTICAL METHODS AND TECHNIQUES: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| e. RESULTS OF CALIBRATIONS: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| f. RESULTS OF ANALYSES: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| g. DATES AND TIMES OF ANALYSES: | <input checked="" type="checkbox"/> Y <input 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 checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR: | <input checked="" type="checkbox"/> S <input type="checkbox"/> M <input 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 |

SECTION C: OPERATIONS AND MAINTENANCE

TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED

S M U NA NEDETAILS: **On-going problems exist with the blowers in pond 2. Five down at time of inspection.**

- | | |
|---|---|
| 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 checked="" type="checkbox"/> S <input 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 checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 5. ALL NEEDED TREATMENT UNITS IN SERVICE: | <input type="checkbox"/> S <input type="checkbox"/> M <input checked="" type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED: 1 Class III and 1 Class I | <input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED: | <input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 8. OPERATION AND MAINTENANCE MANUAL AVAILABLE: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input 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 checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 12. IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED: Monthly SSO report | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 13. HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input 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 NE

DETAILS:

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 checked="" type="checkbox"/> Y <input 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:	<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 NE

DETAILS:

1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: TYPE OF DEVICE: <u>3' rect. Weir w/ end contr.</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 checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
4. CALIBRATION FREQUENCY ADEQUATE: <u>Date of last calibration (2-10-07)</u>	<input checked="" type="checkbox"/> Y <input 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: <u>one per month</u>	<input checked="" type="checkbox"/> Y <input 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 NE

DETAILS:

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 checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
4. QUALITY CONTROL PROCEDURES ADEQUATE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
5. DUPLICATE SAMPLES ARE ANALYZED \geq 10% OF THE TIME:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
6. SPIKED SAMPLES ARE ANALYZED \geq 10% OF THE TIME:	<input checked="" type="checkbox"/> Y <input 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>Data Testing</u>	<u>American Interplex</u>
b. LAB ADDRESS: <u>3434 Country Club Ave. Ft. Smith</u>	<u>8600 Kanis Road Little Rock</u>
c. PARAMETERS PERFORMED: <u>TSS,CBOD,FC,NH3-N</u>	<u>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 type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" 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	Light	Trace	Light	Light Brown	

SECTION H: SLUDGE DISPOSAL

SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS

S M U NA NE

DETAILS: There has not been any recent sludge removal.

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

FLOW CALCULATION SHEET

Date: **11-16-07** Time: **1135**

Head in Inches: **NA** Feet: **.35**

Type & Size of Primary Flow Measurement Device:

3' Rectangular weir with end contractions

Name & Model of Secondary Flow Measurement Device:

Milltronics OCM III

Date of last Calibration of Secondary Flow Device: **February 10, 2007**

Recorded Flow at Date & Time Listed Above: **1.22 mgd** (Facility Flow Meter)

Calculated Flow at Date & Time Listed Above: **1.306 mgd**

(Flow is calculated using flow charts in: ISCO Open Channel Flow Measurement Handbook-5th Edition, Table # 10-5)

% Error =	Recorded Value - Calculated Value	X 100	
	Calculated Value		

% Error =	1.222 - 1.306	X 100	
	1.306		

% Error =	-.084	X 100	
	1.306		

% Error =	-.064	X 100	
-----------	-------	-------	--

% Error =	-6.43	%	
-----------	--------------	---	--

Comments: **OK, within +/- 10%**

DMR Calculation Check

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

Parameter Checked: TSS

	Loading Mass Mo. Avg. - lbs/day	Concentration Monthly Mo. Avg. - mg/l	7-day Avg. - mg/l
Reported Value:	<u>19</u>	<u>8.1</u>	<u>10.0</u>
Calculated Value:	<u>19</u>	<u>8.1</u>	<u>10.0</u>
Permit Value:	<u>438</u>	<u>30</u>	<u>45</u>

If calculated value does not equal reported value, explain: Equal

Water Division NPDES Photographic Evidence Sheet

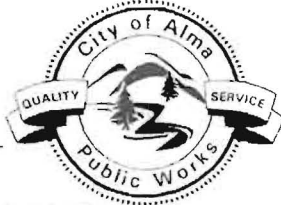
Location:	City of Alma POTW-2500 Orrick Road						
Photographer:	Jeff Tyler			Witness:	None		
Photo #	1	Of	2	Date:	11-16-07	Time:	0950
Description:	On going construction in pond three at the plant. Depth of the pond being increased.						



Photographer:	Jeff Tyler			Witness:	None		
Photo #	2	Of	2	Date:	11-16-07	Time:	1015
Description:	One of the five blowers in pond two which was not in operation at time of the inspection.						

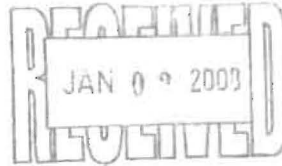


037389
JT



1 Fayetteville Ave
Alma, Arkansas 72921

(501) 632-2254
Fax (501) 632-5136



Water Division Enforcement Section
Arkansas Dept of Environmental Quality
301 Northshore Dr
Little Rock, Arkansas 72118-5317

December 27, 2007

Dear Mr. Tyler,

NPDES Permit AR0021466
Routine Compliance Inspection

In response to the November 16, 2007 routine compliance inspection I offer the following response to the listed violations.

1. Aeration blowers: The aeration contractor is in the process of preparing replacement blowers for all 19 aeration trains. The aerators will be 2-stage blowers that are more appropriately sized for the load. This should eliminate the overload problems that have created the existing failures. The contractor expects the blowers to be ready for delivery and installation by mid January.
2. Ammonia nitrogen: The inadequate supply of oxygen, due to blower failures, is the most likely cause of the exceedances. However, when the current construction of the WWTW is complete, the added detention time should also have a positive impact on the reported ammonia nitrogen. If the proposed changes prove to be inadequate, we will investigate the installation of a fixed film media to improve colony growth.

Please accept my apologies for our failure to satisfy compliance during this period.

Thank you for your understanding. If you have any questions, please contact me at your convenience.

Yours sincerely,

Mark Yardley
Public Works Director

cc: File, Mayor, Operations Supervisor

366

NPDES ENFORCEMENT SECTION, WATER DIVISION

CAO ENFORCEMENT ACTION ROUTING SLIP

FACILITY NAME: City of Alma

DATE: October 26, 2007

AFIN Number: 17-00059

access key # _____
Action key 5736

NPDES Number: AR0021466

3900 03-076
4413 -001

	INITIALS	DATE
TERESA MARKS, <i>DIRECTOR</i>	SM	1/11/08
MARY LEATH, <i>CHIEF DEPUTY DIRECTOR</i>	ML	
LEGAL REVIEW BY: <i>Jamie Ewing</i>	JRE	1/11/08
STEVE DROWN <i>CHIEF of the WATER DIVISION</i>	SD	17 DEC 07
VACANT <i>ASSISTANT CHIEF of the WATER DIVISION</i>	MO	11/29/07
DAVID RAMSEY, <i>PCS SENIOR PROGRAM ANALYST</i>	DR	11-26-7
DENNIS BENSON, <i>TECHNICAL ASSISTANCE MANAGER, NPDES ENFORCEMENT</i>	DB	10/26/07

COMMENTS: The City of Alma is in significant noncompliance due to persistent violations of the ammonia nitrogen limits. The City received a CAO for ammonia nitrogen violations in 2004³ (amendment one to CAO LIS 03-076). The removed overland flow to address this violation, however, it did not result in consistent compliance. The City violated the ammonia limit all six applicable months in 2006 and have exceeded the limit the four months this year (September and October results have not been received yet). In addition, a review of the facility's flow records seems to indicate a significant problem with inflow and infiltration. The average of the peak flows for the past three years is almost three times the design flow of the facility. While the SSO history is not extensive and they have reported very few wet weather overflows, inflow and infiltration could be a major contributor to the effluent violations. The rainwater will disrupt the food to microorganism ratio in the facility and will dilute out the alkalinity.

The Order requires a corrective action plan to address the effluent violations, requires a comprehensive collection system evaluation, requires all pumping stations to be in compliance with the auxiliary power provisions in the permit, requires the permittee to develop a written overflow response plan, and to upgrade all pumping station alarms to direct notification alarms. A penalty in the amount of \$12,200 is proposed.

AR0021466

ALMA, CITY OF

AFIN: 17-00059

Action: 5736

REVIEW# 1 11/26/07

Violations Addressed in the FINDING OF FACT:

Numeric Effluent Violations: (Code with Enforcement Action Violation Type "E3")

3. TSS, NH3 N, & FCB (**E3 00530, 00610, 74055 04/30/05 - 08/31/07 E90**);

Single Event Violations: (Code with Enforcement Action Violation Type "S2")

- 4a. (**S2 B0020 04/11/07**) Improper Operation and Maintenance;
- 4b. (**S2 C0018 04/11/07**) Improper Analysis or Lab Error;
- 4c. (**S2 E0013 04/11/07**) Improper/Incorrect Reporting;
- 4d. (**S2 C0014 04/11/07**) Invalid/ Unrepresentative Sample
- 6. (**S2 B0025 09/01/04 - 10/26/07**) Inflow & Infiltration (I/I);
- 7. (**S2 A0026 08/27/04, 06/14/01, 04/14/05, 02/08/06, 01/28/05, 06/17/05, 08/12/05, 10/17/05, 01/05/06, 01/23/06, 05/01/06, 06/06/06, 11/02/05, 11/02/05, 05/21/07**) SSOs - Overflow to Dry Land or Building Backup

Compliance Schedule Violations: (Code with Enforcement Action Violation Type "C2")

- 5. (**C2 TR 0720 60199 06/01/07 C40**) 5TH ANNUAL LIST-VIO INDS USERS - **Not Received**;
- * (**C2 MC 0722 05599 11/01/07 C40**) OPERATIONAL LEVEL ATTAINED under 03-076-001 - **Not Received** [* Violation not referenced in CAO]

Compliance Activities/Milestones/Reports & Civil Penalties in the ORDER & AGREEMENT:

Extended Compliance Schedule: (**MC 0725**)

- 1 - 2. (**91299**) Submit corrective action report/plan within 30 days of effective date;
- 3. (**08999**) Submit corrective action plan to eliminate peak flows caused by I/I and eliminate all SSOs within 30 days of the effective date;
- 3a. (**82199**) Complete Sewer System Eval within 1 year of the effective date;
- 3b. (**01799**) Submit milestone for sewer repair within 15 months of the effective date;
- 4. (**016AR**) Implement overflow response plan within 90 days of the effective date;
- 5. (**51199**) Establish & maintain inventory of spare parts/submit inventory within 1 year of the effective date;
- 6. (**82199**) Reevaluate sewer system every 2 years
- 7. (**002AR**) Pay Penalty within 30 days of effective date/public notice.

Administrative Limits: None.

Penalty Amount: \$ 12,200 (Enter the Penalty Amount (APAM) on EAP1 Screen.)

Order Effective Date: 30 days after public notice.

Other Comments: Open CAO 03-076 & amd 03-076-001 w/compliance schedule violation.

Is this a new CAO or an amendment to 003-076-001? If this is a new CAO, will 03-076 be closed? There is an overdue compliance schedule event from CAO 03-076-001 that has not been achieved, but it is not addressed by this CAO. Will it be closed when the new order is issued? In paragraph 7 of the O&A the penalty is shown as "\$12,200". Should it be \$12,200 or \$122,000?

Begin Date: 10/26/07 Date Received: 11/01/07

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY

IN THE MATTER OF:

**CITY OF ALMA
CRAWFORD COUNTY**

**LIS NO. 08-
AFIN 17-00059**

CONSENT ADMINISTRATIVE ORDER

This Consent Administrative Order (hereinafter "Order") is issued pursuant to the authority of the Arkansas Water and Air Pollution Control Act (Act 472 of 1949, as amended; Ark. Code Ann. §8-4-101 et seq.) and the regulations issued thereunder (hereinafter collectively referred to as "the Act").

Pursuant to the authority of Ark. Code Ann. §8-4-207(1)(B), the Director for the Arkansas Department of Environmental Quality (hereinafter ADEQ) is authorized to set schedules of compliance for facilities permitted under the Act necessary to assure compliance with both applicable state and federal effluent limitations, including, but not limited to, those mandated by the National Pollutant Discharge Elimination System Program (hereinafter "NPDES") under section 402 of the Federal Water Pollution Control Act, 33 U.S.C. 1342 as well as under sections 301, 318, and 405 of the Federal Water Pollution Control Act, 33 U.S.C. 1311, 33 U.S.C. 1328 and 33 U.S.C. 1345; and Arkansas Pollution Control and Ecology Commission Regulations 2, 6, 7 & 8.

The issues herein having been settled by the agreement of the City of Alma (hereinafter 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 Alma is located in Crawford County. The Permittee operates a wastewater treatment facility pursuant to National Pollutant Discharge Elimination System (NPDES) permit number AR0021466 (hereinafter "the permit").

2. The following effluent limitations are found necessary to achieve and maintain compliance with the terms and conditions of NPDES permit number AR0021466 for outfall number 001:

<u>Effluent Characteristic</u>	<u>Discharge Limitations</u>			
	<u>Lbs/day</u>		<u>Other Units (specify)</u>	
	<u>Daily Max</u>	<u>Monthly Avg</u>	<u>Monthly Avg</u>	<u>7-Day Avg</u>
Flow ¹	Report (mgd)	Report (mgd)	n/a	n/a
Carbonaceous Biochemical Oxygen Demand (CBOD) (May-October)	n/a	365	25 mg/l	37.5 mg/l
Biochemical Oxygen Demand (BOD) (Nov-April)	n/a	438	30 mg/l	45 mg/l
Total Suspended Solids (TSS)	n/a	438	30 mg/l	45 mg/l
Ammonia Nitrogen (NH ₃ -N) (May-October)	n/a	73	5 mg/l	7.5 mg/l
Fecal Coliform Bacteria (FCB) (April – September) (October – March)	n/a	n/a	200 col/100 ml 1000 col/100 ml	400 col/100 ml 2000 col/100 ml
Total Residual Chlorine (TRC)	n/a	n/a	0.1 mg/l (inst. Max)	
Acute Biomonitoring	n/a	n/a	n/a	n/a
<u>Pimephales promelas (Acute)</u> Pass/Fail Lethality (48-Hr NOEC) TEM6C Survival (48-Hr NOEC) TOM6C Coefficient of Variation (48-Hr NOEC) TQM6C			48-hr Minimum Report (Pass=0/Fail=1) Report % Report %	
<u>Daphnia pulex (Acute)</u>			48-hr Minimum	

Pass/Fail Lethality (48-Hr NOEC) TEM3D	Report (Pass=0/Fail=1)
Survival (48-Hr NOEC) TOM3D	Report %
Coefficient of Variation (48-Hr NOEC) TQM3D	Report %
In addition to the above:	
1 Flow must be measured once per day and reported to ADEQ on monthly DMR.	
The pH shall not be less than 6.0 standard units nor greater than 9.0 standard units and shall be monitored three times per week by grab sample. Samples taken in compliance with the monitoring requirements specified above shall be taken at the discharge point prior to commingling with the receiving stream, when discharging, and the results reported on monthly DMR.	
Effluent discharge characteristic limitations (CBOD, BOD, TSS, Ammonia) requirements shall be measured at least three times per week by 6-hour composite samples. Samples taken in compliance with the monitoring requirements specified above shall be taken at the discharge point prior to commingling with the receiving stream, when discharging, and all measurements reported to ADEQ on monthly DMR.	
Effluent discharge characteristic limitations (TRC, FCB) requirements shall be measured at least three times per week by grab samples. Samples taken in compliance with the monitoring requirements specified above shall be taken at the discharge point prior to commingling with the receiving stream, when discharging, and all measurements reported to ADEQ on monthly DMR.	
Acute biomonitoring samples shall be collected once every six months, when discharging by 24 hour composite sample and reported to ADEQ on a semiannual DMR.	

3. Violations of the effluent characteristic limits in Part I, Section A of the permit since March 2005, are as follows:

<u>DATE</u>	<u>PARAMETER</u>	<u>REPORTED</u>	<u>PERMITTED</u>
04/30/05	TSS (mo. avg. loading)	2156.06 lbs/day	438 lbs/day
04/30/05	TSS (mo. avg. conc.)	67.50 mg/l	30 mg/l
04/30/05	TSS (7-day avg. conc.)	193.33 mg/l	45 mg/l
05/31/05	TSS (mo. avg. conc.)	31.85 mg/l	30 mg/l
05/31/05	TSS (7-day avg. conc.)	47.67 mg/l	45 mg/l
05/31/06	NH3-N (mo. avg. conc.)	21.44 mg/l	5 mg/l
05/31/06	NH3-N (7-day avg. conc.)	26.77 mg/l	7.5 mg/l
05/31/06	FCB (7-day geo mean.)	438.78 col/100 ml	400 col/100 ml
06/30/06	NH3-N (mo. avg. loading)	74.15 lbs/day	73 lbs/day
06/30/06	NH3-N (mo. avg. conc.)	17.67 mg/l	5 mg/l
06/30/06	NH3-N (7-day avg. conc.)	21.10 mg/l	7.5 mg/l
07/31/06	NH3-N (mo. avg. conc.)	16.47 mg/l	5 mg/l
07/31/06	NN3-N (7-day avg. conc.)	20.77 mg/l	7.5 mg/l

<u>DATE</u>	<u>PARAMETER</u>	<u>REPORTED</u>	<u>PERMITTED</u>
08/31/06	NH3-N (mo. avg. conc.)	16.34 mg/l	5 mg/l
08/31/06	NN3-N (7-day avg. conc.)	23.27 mg/l	7.5 mg/l
09/30/06	TSS (mo. avg. conc.)	34.25 mg/l	30 mg/l
09/30/06	TSS (7-day avg conc.)	46.67 mg/l	45 mg/l
09/30/06	NH3-N (mo. avg. conc.)	10.58 mg/l	5 mg/l
09/30/06	NH3-N (7-day avg. conc.)	16.85 mg/l	7.5 mg/l
10/31/06	NH3-N (mo. avg. conc.)	11.29 mg/l	5 mg/l
10/31/06	NH3-N (7-day avg. conc.)	13.53 mg/l	7.5 mg/l
05/31/07	NH3-N (mo. avg. conc.)	9.83 mg/l	5 mg/l
05/31/07	NH3-N (7-day avg. conc.)	15.83 mg/l	7.5 mg/l
06/30/07	NH3-N (mo. avg. conc.)	8.9 mg/l	5 mg/l
06/30/07	NH3-N (7-day avg. conc.)	10.3 mg/l	7.5 mg/l
07/31/07	NH3-N (mo. avg. conc.)	5.7 mg/l	5 mg/l
08/31/07	NH3-N (mo. avg. conc.)	5.14 mg/l	5 mg/l

add Violations 9/30/07 10/31/07

4. On April 11, 2007, the Department performed a routine compliance inspection of the permitted facility. The inspection revealed the following violations:

a. At the time of the inspection, four blowers in the initial cell were not in operation. This is a violation of Part II, Section B, paragraph 1 of the permit which requires the facility to be properly operated and maintained at all times.

b. The Permittee was not recording the pH and temperature values when performing calibration of the pH meter. This is a violation of Part II, Section C, paragraph 3 and Part II, Section C, paragraphs 7 and 8 of the permit.

c. The Permittee was not including the name and address of the contract laboratory on the Discharge Monitoring Reports (DMRs) as required by Part II, Section C, paragraph 5 of the permit.

delete

d. The Permittee was not monitoring pH by grab sample as required by Part I, Section A of the permit. The Permittee was checking pH by lowering the pH probe in the effluent flow. Part IV, paragraph 11 of the permit defines a grab sample as an

individual sample collected in less than 15 minutes in conjunction with an instantaneous flow measurement.

del
5. The Permittee has failed to submit the updated industrial users list in May 2007 as required Part III, Section 9, 2, c of the permit.

6. The wastewater treatment plant operated by the Permittee has a design capacity of 1.75 million gallon per day (mgd). Since August 2004, the average daily flow has been 1.43 mgd or 83% of design. Peak flows have ranged as high as 19.195 mgd or approximately eleven (11) times the design flow. The average of the peak flows since August 2004 is 5.12 mgd or almost three (3) times the design flow. The extremely high peak flows indicate a significant problem with inflow into the wastewater treatment system and maybe contributing to problems achieving consistent compliance with effluent limits.

7. The Permittee has reported several sanitary sewer overflows (SSOs) in the past three years. Sanitary sewer overflows are unpermitted discharges in violation of A.C.A. § 8-4-217(b)(1)(E). A list of the SSOs is attached to this Order.

8. 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 Order, the Permittee shall submit to ADEQ, a comprehensive Corrective Action Report which shall detail the steps the Permittee took to achieve full compliance with the effluent characteristic limits of the permit.
2. If the Permittee determines that full compliance with the terms of the permit cannot be achieved within thirty (30) days of the effective date of this Order, the Permittee shall submit to ADEQ a comprehensive plan, with milestone schedule in lieu of the corrective action report required by paragraph 1 above. The plan shall detail the steps the Permittee shall take to achieve compliance with the terms of the permit and to eliminate the effluent characteristics violations cited in paragraph 3 of the Findings of Fact and to prevent future violations. Upon approval by ADEQ, the submitted milestone schedule shall be incorporated into this Order by reference and shall be followed by the Permittee. Failure to comply with the schedule, as approved by ADEQ, shall be subject to the stipulated penalties contained in paragraph 9 below.
3. Within thirty (30) days of the effective date of this Order, the Permittee shall submit to ADEQ, a comprehensive Corrective Action Plan which shall detail the steps the Permittee shall take to eliminate peak flows caused by inflow and infiltration. This plan shall at a minimum include the following items:
 - a. The Permittee shall complete a comprehensive collection system evaluation within one (1) year of the effective date of this order. This comprehensive collection system evaluation shall identify all wastewater mains and pumping stations that cannot carry peak hydraulic loads caused by inflow and infiltration. The evaluation

shall also identify all pumping stations that do not have auxiliary power or sufficient storage as required by Part II, Section B, paragraph 7 and shall identify all pumping stations that do not have direct notification alarms.

b. The Permittee shall submit to the Department within fifteen (15) months of the effective date of this order a milestone schedule for the replacement and/or repair of all wastewater mains and pumping stations that cannot convey peak hydraulic loads as identified by the comprehensive collection system evaluation required in paragraph 1 a of this section. This milestone schedule shall include dates for the installation of direct notification alarms and auxiliary power or storage capacity at deficient pumping stations identified during the collection system evaluation. Upon approval by ADEQ, the submitted milestone schedule shall be incorporated into this Order by reference and shall be followed by the Permittee. Failure to comply with the schedule, as approved by ADEQ, shall be subject to the stipulated penalties contained in paragraph 9 below.

4. Within ninety (90) days of the effective date of the CAO, the Permittee will establish and implement an overflow response plan which shall:

- a. Identify the individual(s) responsible for making the appropriate reports (24-hour notification and monthly tabular reports) to the Department,
- b. Ensure that collection system overflows are identified and responded to in a timely manner,
- c. Establish written procedures for cleaning up after sanitary sewer overflows,

- 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.
5. Within one (1) year the Permittee shall establish and maintain a minimum inventory of spare parts necessary to make immediate repairs to the pump stations, wastewater lines, and manholes. The Permittee will submit this inventory list to the Department upon completion of the inventory.
6. The Permittee shall at least every two (2) years reevaluate the wastewater collection system and make whatever changes are necessary to the corrective action plan and construction projects to ensure the Permittee meets the goal of elimination of collection system overflows and problems related to peak hydraulic loads.
7. In compromise and full settlement of the civil penalties for violations (specified in the Findings of Fact), the Permittee agrees to pay to ADEQ the total sum of Twelve Thousand Two Hundred Dollars (\$12,200) as a voluntary civil penalty. Payment of the penalty shall be made within thirty (30) days of the effective date of this Order, 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 72118-5317

8. All submittals required by this Order 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 9 below.

9. Failure to meet the requirements, effluent limits or construction deadlines of this Order or the approved schedules provided for herein constitutes a violation of said Order. 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 Order.

10. 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 Order, 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.

11. ADEQ may grant an extension of any provision of this Order, 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 10 of this section, shall be grounds for a denial of an extension.

12. This Order 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 final until thirty (30) days after public notice is given. ADEQ retains the right to rescind this Order 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.

13. 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 Order is granted by the Commission.

14. Nothing in this Order shall be construed as a waiver by ADEQ of its enforcement authority over alleged violations not specifically addressed herein. Also, this Order 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 THE _____ DAY OF _____, 2008

Teresa Marks, Director

APPROVED AS TO FORM AND CONTENT:

BY: _____
(Signature)

(Typed or printed name)

TITLE: _____
(Typed or printed title)

DATE: _____

		<i>Description</i>	<i>Cause</i>	<i>Actions</i>	
10032	<i>start</i> 8/12/2005	15 gallons	<input type="checkbox"/> Capacity	<input checked="" type="checkbox"/> Non-Capacity	<input type="checkbox"/> Bypass <input checked="" type="checkbox"/> SSO
	<i>stop</i> 8/12/2005	823 Highway 71 North	blockage	Jet rodded line to eliminate the blockage	
<i>Location:</i>					
10270	<i>start</i> 10/17/2005	2160 gallons	<input type="checkbox"/> Capacity	<input checked="" type="checkbox"/> Non-Capacity	<input type="checkbox"/> Bypass <input checked="" type="checkbox"/> SSO
	<i>stop</i> 10/17/2005	manhole #21-10-1 in grassy field on south side of Hwy. 64 B overflowed	blockage due to grease and roots	pressure cleaned and chmically treated for roots and grease	
<i>Location:</i>					
10554	<i>start</i> 1/5/2006	200 gallons	<input type="checkbox"/> Capacity	<input checked="" type="checkbox"/> Non-Capacity	<input type="checkbox"/> Bypass <input checked="" type="checkbox"/> SSO
	<i>stop</i> 1/5/2006	overflow at 222 Main St., Manhole 27-1-3	unknown blockage in line	pressure cleaned sewer main to remove blockage, spread lime in ditch area, no standing water	
<i>Location:</i>					
10725	<i>start</i> 1/23/2006	50 gallons	<input type="checkbox"/> Capacity	<input checked="" type="checkbox"/> Non-Capacity	<input type="checkbox"/> Bypass <input checked="" type="checkbox"/> SSO
	<i>stop</i> 1/23/2006	overflow at manhole # 21-11 near 814 E. Cherry St.	unknown blockage	pressure rodded main to remove blockage; small amount of water was around manhole-limed area.	
<i>Location:</i>					
11469	<i>start</i> 5/1/2006	2000 gallons	<input type="checkbox"/> Capacity	<input checked="" type="checkbox"/> Non-Capacity	<input type="checkbox"/> Bypass <input checked="" type="checkbox"/> SSO
	<i>stop</i> 5/1/2006	overflow at Collum Lane Lift Station	electrical fuses blown on in-coming power; possibly caused by lightening.	Electrician repaired pumps and electrical components	
<i>Location:</i> Collum Lane, Alma					
11750	<i>start</i> 6/6/2006	1500 gallons	<input type="checkbox"/> Capacity	<input checked="" type="checkbox"/> Non-Capacity	<input type="checkbox"/> Bypass <input checked="" type="checkbox"/> SSO
	<i>stop</i> 6/6/2006		equipment failure	repaired the equipment	
<i>Location:</i> Collum Lane lift station					
12624	<i>start</i> 11/17/2006	999 gallons	<input type="checkbox"/> Capacity	<input checked="" type="checkbox"/> Non-Capacity	<input type="checkbox"/> Bypass <input checked="" type="checkbox"/> SSO
	<i>stop</i> 11/17/2006	Manhole overflow	Blockage caused by roots or grease	Pressure rodded to remove blockage and spread lime around manhole area	
<i>Location:</i> Manhole 23-2-3					
12139	<i>start</i> 11/17/2006	1000 gallons	<input type="checkbox"/> Capacity	<input checked="" type="checkbox"/> Non-Capacity	<input type="checkbox"/> Bypass <input checked="" type="checkbox"/> SSO
	<i>stop</i> 11/17/2006	Very small overflow at Manhole #23-2-3	Blockage caused by roots or grease	Pressure rodded to remove blockage and spread lime around manhole area.	
<i>Location:</i>					

Bypass and SSO Report

Friday, October 26, 2007

by NPID and DATE RANGE

		Description	Cause	Actions	
AR002 ALMA, CITY OF				Other id/Permit Number:	Name:
8322	start 8/27/2004	1000 gallons	<input type="checkbox"/> Capacity <input type="checkbox"/> Non-Capacity	<input type="checkbox"/> Bypass <input type="checkbox"/> SSO	
	stop 8/28/2004	Kimes Field - Highway 71 North	Roots or grease		Jet rodded line from both directions eliminating the blockage, limed the area around the manhole
Location:					
8864	start 11/1/2004	900 gallons	<input checked="" type="checkbox"/> Capacity <input type="checkbox"/> Non-Capacity	<input checked="" type="checkbox"/> Bypass <input type="checkbox"/> SSO	
	stop 11/1/2004	Mulberry Street	Heavy rains and grease		Jet rodded line to eliminate the blockage
Location:					
8865	start 11/15/2004	2160 gallons	<input type="checkbox"/> Capacity <input checked="" type="checkbox"/> Non-Capacity	<input type="checkbox"/> Bypass <input checked="" type="checkbox"/> SSO	
	stop 11/15/2004	1034 Highway 71 North	blockage		Jet rodded line to eliminate the blockage and lime applied to the area
Location:					
8866	start 11/18/2004	360 gallons	<input type="checkbox"/> Capacity <input checked="" type="checkbox"/> Non-Capacity	<input type="checkbox"/> Bypass <input checked="" type="checkbox"/> SSO	
	stop 11/18/2004	Highway 64 East	Blockage & heavy rainfall		Jet rodded line to eliminate the blockage
Location:					
9211	start 1/28/2005	300 gallons	<input type="checkbox"/> Capacity <input checked="" type="checkbox"/> Non-Capacity	<input type="checkbox"/> Bypass <input checked="" type="checkbox"/> SSO	
	stop 1/28/2005	Highway 64 East, manhole #21-14	Blockage		Jet rodded line to eliminate the blockage
Location:					
9856	start 6/17/2005	1800 gallons	<input type="checkbox"/> Capacity <input checked="" type="checkbox"/> Non-Capacity	<input type="checkbox"/> Bypass <input checked="" type="checkbox"/> SSO	
	stop 6/17/2005	35 Column Lane pump station	Power outage - lightning		Replaced damaged control components & wiring
Location:					

		<i>Description</i>	<i>Cause</i>	<i>Actions</i>
13816	<i>start</i> 5/21/2007	5000 gallons	<input type="checkbox"/> Capacity	<input checked="" type="checkbox"/> Non-Capacity
	<i>stop</i> 5/21/2007	Discharge is ponding in low area of pature.	Excessive grease and other	<input type="checkbox"/> Bypass <input checked="" type="checkbox"/> SSO
				Pressure rodded to remove blockage

Location: In pasture

City of Alma, NPDES Permit AR0021466, Violation #1

It shall be unlawful for any person to violate any provisions of this chapter or of any rule, regulation, or order adopted by the Arkansas Pollution Control and Ecology Commission under this chapter or of a permit issued under this chapter -A.C.A § 8-4-217(a)(3). - *The Permittee has exceeded the effluent limits in Part I, Section A of the permit.*

DATE OF VIOLATION: Since July 2003, Paragraph 3 of Findings of Fact (treated as one violation)

Reg 7, Section 9 subpart	factors	range	points
A	The seriousness of the noncompliance and its effect on the environment, including the degree of potential or actual risk or harm to the public health caused by the violation.	0 to 15	6
	Violations of the effluent limits are serious violations. Effluent limits are designed to be protective of the receiving stream. There are no indication that the violations have resulted in violations of water quality standards.		
B	Whether the cause of the noncompliance was an unavoidable accident.	-5 to 10	2
	The cause of the noncompliance does not appear to be an unavoidable accident.		
C	The violator's cooperativeness and expeditious efforts to correct the violation.	0 to 10	4
	The violator's noncompliance reports indicate they are attempting to correct the problem, however, most of the violations are ammonia nitrogen which have persisted during the summer months for three years. The violator has been cooperative, but not expditious.		
D	The violator's history in taking all reasonable steps or procedures necessary or appropriate to correct any noncompliance.	0 to 10	3
	The violator was cited for ammonia nitrogen violations in CAO LIS No. 03-076-001, but have been unable to achieve consistent compliance, therefore they have not taken reasonable steps to correct the noncompliance.		
E	The violator's history of previous documented violations regardless of whether or not other administrative, civil, or criminal proceedings were commenced therefore.	0 to 10	5
	The City of Alma was issued CAO LIS No. 03-076 and 03-076-001 for previous violations		
F	Whether the cause of the violation was an intentional act or omission on the part of the violator.	0 to 15	1
	The violation appears to be an omission.		
G	Whether the noncompliance has resulted in an economic benefit or pecuniary gain to the violator , including but not limited to cost avoidance	0 to 10	0
	It does not appear that any economic benefit was received due to this violation.		
H	Whether the pursuit and the execution of the enforcement action has resulted in unusual or extraordinary costs to the Department or public.	0 to 10	0
	There were no unusual or extraordinary costs to the Department or public.		
I	Whether any part of the noncompliance is attributable to the action or inaction of the State government.	-5 to 0	0
	The noncompliance is not attributable to the action or inaction of the State government.		
J	Whether the violator has delayed corrective action.	0 to 10	5
	Since the effluent violations for ammonia nitrogen have persisted since 2004, the violator has delayed taking effective corrective action.		
POINT TOTAL			26

Total Points ÷ 100 X \$10,000 = Civil Penalty

\$2,600.00

City of Alma, NPDES Permit AR0021466, Violation #2

It shall be unlawful for any person to violate any provisions of this chapter or of any rule, regulation, or order adopted by the Arkansas Pollution Control and Ecology Commission under this chapter or of a permit issued under this chapter -A.C.A § 8-4-217(a)(3). **Proper Operation and Maintenance - The owner or operator 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 owner or operator to achieve compliance with the conditions of this permit. Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures. This provision requires the operation of backup or auxiliary facilities or similar systems which are installed by a owner or operator only when the operation is necessary to achieve compliance with the conditions of the permit. Part II, Section B, Paragraph 1 of the Permit.**

DATE OF VIOLATION: April 11, 2007, Paragraph 4a of Findings of Fact

Reg 7, Section 9 subpart	factors	range	points
A	The seriousness of the noncompliance and its effect on the environment, including the degree of potential or actual risk or harm to the public health caused by the violation.	0 to 15	6
	Improper operations and maintenance results in inefficient treatment increasing the level of pollutants discharged from the plant. It is suspected that insufficient aeration due to blowers not being operated has caused or contributed to the ammonia nitrogen violations.		
B	Whether the cause of the noncompliance was an unavoidable accident.	-5 to 10	2
	The cause of the noncompliance does not appear to be an unavoidable accident.		
C	The violator's cooperativeness and expeditious efforts to correct the violation.	0 to 10	2
	The violator has indicated they are working to fix the problem.		
D	The violator's history in taking all reasonable steps or procedures necessary or appropriate to correct any noncompliance.	0 to 10	3
	The violator was cited for ammonia nitrogen violations in CAO LIS No. 03-076-001, but have been unable to achieve consistent compliance, therefore they have not taken reasonable steps to correct the noncompliance.		
E	The violator's history of previous documented violations regardless of whether or not other administrative, civil, or criminal proceedings were commenced therefore.	0 to 10	5
	The City of Alma was issued CAO LIS No. 03-076 and 03-076-001 for previous violations		
F	Whether the cause of the violation was an intentional act or omission on the part of the violator.	0 to 15	1
	The violation appears to be an omission.		
G	Whether the noncompliance has resulted in an economic benefit or pecuniary gain to the violator, including but not limited to cost avoidance	0 to 10	0
	There may have been an economic benefit due to the failure to maintain the facilities. However, the exact cost benefit has not been determined.		
H	Whether the pursuit and the execution of the enforcement action has resulted in unusual or extraordinary costs to the Department or public.	0 to 10	0
	There were no unusual or extraordinary costs to the Department or public.		
I	Whether any part of the noncompliance is attributable to the action or inaction of the State government.	-5 to 0	0
	The noncompliance is not attributable to the action or inaction of the State government.		
J	Whether the violator has delayed corrective action.	0 to 10	1
	It does not appear that the violator has delayed corrective action.		
POINT TOTAL			20

Total Points ÷ 100 X \$10,000 = Civil Penalty

\$2,000.00

City of Alma, NPDES Permit AR0021466, Violation #3

It shall be unlawful for any person to violate any provisions of this chapter or of any rule, regulation, or order adopted by the Arkansas Pollution Control and Ecology Commission under this chapter or of a permit issued under this chapter -A.C.A § 8-4-217(a)(3). - *The Permittee was not recording the pH and temperature values when performing calibration of the pH meter. This is a violation of Part II, Section C, paragraph 3 and Part II, Section C, paragraphs 7 and 8 of the permit and the Permittee was not putting the name and address of the contract laboratory on the DMR as required by Part II, Section C, paragraph 5 of the permit.*

DATE OF VIOLATION: April 11, 2007, Paragraph 4b of Findings of Fact

Reg 7, Section 9 subpart	factors	range	points
A	The seriousness of the noncompliance and its effect on the environment, including the degree of potential or actual risk or harm to the public health caused by the violation.	0 to 15	1
	These are recordkeeping and monitoring violations and are not serious violations nor have these violations caused or contributed to any environmental or human health impact.		
B	Whether the cause of the noncompliance was an unavoidable accident.	-5 to 10	2
	The cause of the noncompliance does not appear to be an unavoidable accident.		
C	The violator's cooperativeness and expeditious efforts to correct the violation.	0 to 10	0
	The violator has indicated the problem has been fixed.		
D	The violator's history in taking all reasonable steps or procedures necessary or appropriate to correct any noncompliance.	0 to 10	3
	The violator was cited for ammonia nitrogen violations in CAO LIS No. 03-076-001, but have been unable to achieve consistent compliance, therefore they have not taken reasonable steps to correct the noncompliance.		
E	The violator's history of previous documented violations regardless of whether or not other administrative, civil, or criminal proceedings were commenced therefore.	0 to 10	5
	The City of Alma was issued CAO LIS No. 03-076 and 03-076-001 for previous violations		
F	Whether the cause of the violation was an intentional act or omission on the part of the violator.	0 to 15	1
	The violation appears to be an omission.		
G	Whether the noncompliance has resulted in an economic benefit or pecuniary gain to the violator, including but not limited to cost avoidance	0 to 10	0
	It does not appear that any economic benefit was received due to this violation.		
H	Whether the pursuit and the execution of the enforcement action has resulted in unusual or extraordinary costs to the Department or public.	0 to 10	0
	There were no unusual or extraordinary costs to the Department or public.		
I	Whether any part of the noncompliance is attributable to the action or inaction of the State government.	-5 to 0	0
	The noncompliance is not attributable to the action or inaction of the State government.		
J	Whether the violator has delayed corrective action.	0 to 10	0
	The violator did not delay taking corrective action.		
POINT TOTAL			12

Total Points +100 X \$10,000 = Civil Penalty

\$1,200.00

City of Alma, NPDES Permit AR0021466, Violation #4

It shall be unlawful for any person to violate any provisions of this chapter or of any rule, regulation, or order adopted by the Arkansas Pollution Control and Ecology Commission under this chapter or of a permit issued under this chapter -A.C.A § 8-4-217(a)(3). - *The Permittee was not monitoring pH by grab sample as required by Part I, Section A of the permit. The Permittee was checking pH by lowering the pH probe in the effluent flow. Part IV, paragraph 11 of the permit defines a grab sample as an individual sample collected in less than 15 minutes in conjunction with an instantaneous flow measurement.*

DATE OF VIOLATION: April 11, 2007, Paragraph 4d of Findings of Fact

Reg 7, Section 9 subpart	factors	range	points
A	The seriousness of the noncompliance and its effect on the environment, including the degree of potential or actual risk or harm to the public health caused by the violation.	0 to 15	2
	This is a moderate violaton that has no impact on the environment or human health. However, it could result in misleading pH results.		
B	Whether the cause of the noncompliance was an unavoidable accident.	-5 to 10	2
	The cause of the noncompliance does not appear to be an unavoidable accident.		
C	The violator's cooperativeness and expeditious efforts to correct the violation.	0 to 10	0
	The violator has indicated the problem has been fixed.		
D	The violator's history in taking all reasonable steps or procedures necessary or appropriate to correct any noncompliance.	0 to 10	3
	The violator was cited for ammonia nitrogen violations in CAO LIS No. 03-076-001, but have been unable to achieve consistent compliance, therefore they have not taken reasonable steps to correct the noncompliance.		
E	The violator's history of previous documented violations regardless of whether or not other administrative, civil, or criminal proceedings were commenced therefore.	0 to 10	5
	The City of Alma was issued CAO LIS No. 03-076 and 03-076-001 for previous violations		
F	Whether the cause of the violation was an intentional act or omission on the part of the violator.	0 to 15	1
	The violation appears to be an omission.		
G	Whether the noncompliance has resulted in an economic benefit or pecuniary gain to the violator , including but not limited to cost avoidance	0 to 10	0
	It does not appear that any economic benefit was received due to this violation.		
H	Whether the pursuit and the execution of the enforcement action has resulted in unusual or extraordinary costs to the Department or public.	0 to 10	0
	There were no unusual or extraordinary costs to the Department or public.		
I	Whether any part of the noncompliance is attributable to the action or inaction of the State government.	-5 to 0	0
	The noncompliance is not attributable to the action or inaction of the State government.		
J	Whether the violator has delayed corrective action.	0 to 10	0
	The violator did not delay taking corrective action.		
POINT TOTAL			13

Total Points +100 X \$10,000 = Civil Penalty

\$1,300.00

City of Alma, NPDES Permit AR0021466, Violation #5

It shall be unlawful for any person to violate any provisions of this chapter or of any rule, regulation, or order adopted by the Arkansas Pollution Control and Ecology Commission under this chapter or of a permit issued under this chapter -A.C.A § 8-4-217(a)(3). - *The Permittee has failed to submit the updated industrial users list in May 2007 as required Part III, Section 9, 2, c of the permit.*

DATE OF VIOLATION: June 1, 2007, Paragraph 5 of Findings of Fact

Reg 7, Section 9 subpart	factors	range	points
A	The seriousness of the noncompliance and its effect on the environment, including the degree of potential or actual risk or harm to the public health caused by the violation.	0 to 15	4
	Failure to update the industrial user survey is a moderate violation. There is no indication that this violation has resulted in harm to the environment or human health. However, it is possible that discharges from industrial users could have contributed to the effluent violations.		
B	Whether the cause of the noncompliance was an unavoidable accident.	-5 to 10	2
	The cause of the noncompliance does not appear to be an unavoidable accident.		
C	The violator's cooperativeness and expeditious efforts to correct the violation.	0 to 10	5
	According to ADEQ's Pretreatment Coordinator, this violation has not been corrected.		
D	The violator's history in taking all reasonable steps or procedures necessary or appropriate to correct any noncompliance.	0 to 10	3
	The violator was cited for ammonia nitrogen violations in CAO LIS No. 03-076-001, but have been unable to achieve consistent compliance, therefore they have not taken reasonable steps to correct the noncompliance.		
E	The violator's history of previous documented violations regardless of whether or not other administrative, civil, or criminal proceedings were commenced therefore.	0 to 10	5
	The City of Alma was issued CAO LIS No. 03-076 and 03-076-001 for previous violations		
F	Whether the cause of the violation was an intentional act or omission on the part of the violator.	0 to 15	1
	The violation appears to be an omission.		
G	Whether the noncompliance has resulted in an economic benefit or pecuniary gain to the violator, including but not limited to cost avoidance	0 to 10	0
	It does not appear that any economic benefit was received due to this violation.		
H	Whether the pursuit and the execution of the enforcement action has resulted in unusual or extraordinary costs to the Department or public.	0 to 10	0
	There were no unusual or extraordinary costs to the Department or public.		
I	Whether any part of the noncompliance is attributable to the action or inaction of the State government.	-5 to 0	0
	The noncompliance is not attributable to the action or inaction of the State government.		
J	Whether the violator has delayed corrective action.	0 to 10	5
	Since this violation has not been corrected, the violator has delayed taking corrective action.		
POINT TOTAL			25

Total Points +100 X \$10,000 = Civil Penalty

\$2,500.00

City of Alma, NPDES Permit AR0021466, Violation #6

It shall be unlawful for any person to engage in any of the following acts without having first obtained a written permit from the commission to discharge sewage, industrial waste, or other wastes into any of the waters of this state. - A.C.A. § 8-4-217 (b)(1)(E). - Sanitary Sewer Overflows

DATE OF VIOLATION: All sanitary sewer overflows since August 2004 including those not reported, treated as one violation - Paragraph 7 of Findings of Fact

Reg 7, Section 9 subpart	factors	range	points
A	The seriousness of the noncompliance and its effect on the environment, including the degree of potential or actual risk or harm to the public health caused by the violation.	0 to 15	6
	Sanitary sewer overflows represent a significant potential to harm human health because of the discharge is untreated sewage. These are serious violations		
B	Whether the cause of the noncompliance was an unavoidable accident.	-5 to 10	2
	The cause of the noncompliance was not an unavoidable accident.		
C	The violator's cooperativeness and expeditious efforts to correct the violation.	0 to 10	1
	The violator has been working on addressing inflow and infiltration, however, it appears these activities have been more reactive rather than comprehensive.		
D	The violator's history in taking all reasonable steps or procedures necessary or appropriate to correct any noncompliance.	-5 to 10	3
	The violator was cited for ammonia nitrogen violations in CAO LIS No. 03-076-001, but have been unable to achieve consistent compliance, therefore they have not taken reasonable steps to correct the noncompliance.		
E	The violator's history of previous documented violations regardless of whether or not other administrative, civil, or criminal proceedings were commenced therefore.	0 to 10	5
	The City of Alma was issued CAO LIS No. 03-076 and 03-076-001 for previous violations		
F	Whether the cause of the violation was an intentional act or omission on the part of the violator.	0 to 15	3
	The overflows are the result of an omission and could be avoided with a diligent maintenance program.		
G	Whether the noncompliance has resulted in an economic benefit or pecuniary gain to the violator, including but not limited to cost avoidance	0 to 10	3
	The City has probably received a significant economic benefit due to money saved that should have been spent in collection system system maintenance.		
H	Whether the pursuit and the execution of the enforcement action has resulted in unusual or extraordinary costs to the Department or public.	0 to 10	0
	No extraordinary or unusual costs were incurred.		
I	Whether any part of the noncompliance is attributable to the action or inaction of the State government.	-5 to 0	0
	The noncompliance was not caused by any action or inaction of ADEQ.		
J	Whether the violator has delayed corrective action.	0 to 10	3
	It appears the City has delayed taking effective corrective actions.		
POINT TOTAL			26

Total Points +100 X \$10,000 = Civil Penalty

\$2,600.00

ADEQ

ARKANSAS
Department of Environmental Quality

September 2, 2008

City of Alma
The Honorable John R. Ballentine, Mayor
804 Fayetteville Avenue
Alma, AR 72921

RE: NPDES Permit AR0021466, AFIN 17-00059, CAO LIS No. 08-105

Dear Mayor Ballentine:

Enclosed is your signed copy of the Consent Administrative Order (CAO) to which representatives of the City of Alma and ADEQ agreed subsequent to our meeting. The Director signed the Order on August 29, 2008, and it must now be sent to public notice. The next scheduled date for ADEQ to send items to public notice will be September 10, 2008. Since the effective date of a CAO is thirty days after public notice is formally given, this means that the effective date of this CAO will most likely be October 10, 2008.

Please make note of the following important deadlines established for the City of Alma by the CAO:

November 9, 2008

- Corrected March '08 DMR or noncompliance report due (Order and Agreement Paragraph 2)
- Corrective Action Report (Paragraph 3) or Corrective Action Plan (Paragraph 4) for compliance due
- Corrective Action Plan addressing inflow and infiltration (Paragraph 5) due
- \$5,400 penalty due (Paragraph 9)

January 8, 2009

- Overflow response plan to be established and implemented (Paragraph 6)

November 10, 2009

- Inventory of spare parts to be submitted to ADEQ (Paragraph 7)

The Honorable John R. Ballentine, Mayor
Page 2 of 2

Please mail all submissions under this CAO to the attention of ADEQ Water Enforcement, and be sure to refer to NPDES Permit AR0021466 in any written correspondence to ADEQ.

Thank you for your attention to this matter. 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.

Sincerely,

A handwritten signature in cursive script that reads "Anne Roberts". The signature is written in dark ink and is positioned above the typed name.

Anne Roberts
Enforcement Administrator
Water Enforcement Section

Enclosure

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY

IN THE MATTER OF:

CITY OF ALMA
CRAWFORD COUNTY

LIS NO. 08-105
AFIN 17-00059

CONSENT ADMINISTRATIVE ORDER

This Consent Administrative Order ("Order") is issued pursuant to the authority of the Arkansas Water and Air Pollution Control Act (Act 472 of 1949, as amended; Ark. Code Ann. §8-4-101 et seq.) and the regulations issued thereunder (hereinafter collectively referred to as "the Act").

Pursuant to the authority of Ark. Code Ann. §8-4-207(1)(B), the Director for the Arkansas Department of Environmental Quality ("ADEQ") is authorized to set schedules of compliance for facilities permitted under the Act necessary to assure compliance with both applicable state and federal effluent limitations, including, but not limited to, those mandated by the National Pollutant Discharge Elimination System Program ("NPDES") under section 402 of the Federal Water Pollution Control Act, 33 U.S.C. 1342 as well as under sections 301, 318, and 405 of the Federal Water Pollution Control Act, 33 U.S.C. 1311, 33 U.S.C. 1328 and 33 U.S.C. 1345; and Arkansas Pollution Control and Ecology Commission Regulations 2, 6, 7 & 8.

The issues herein having been settled by the agreement of the City of Alma ("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 Alma is located in Crawford County. The Permittee operates a wastewater treatment facility pursuant to NPDES permit number AR0021466 ("the permit").

2. Violations of the effluent characteristic limits in Part I, Section A of the permit for outfall number 001, as found in Discharge Monitoring Reports (“DMRs”) submitted by the Permittee to ADEQ since March 2005, are as follows:

<u>DATE</u>	<u>PARAMETER</u>	<u>REPORTED</u>	<u>PERMITTED</u>
04/30/05	TSS (mo. avg. loading)	2156.06 lbs/day	438 lbs/day
04/30/05	TSS (mo. avg. conc.)	67.50 mg/l	30 mg/l
04/30/05	TSS (7-day avg. conc.)	193.33 mg/l	45 mg/l
05/31/05	TSS (mo. avg. conc.)	31.85 mg/l	30 mg/l
05/31/05	TSS (7-day avg. conc.)	47.67 mg/l	45 mg/l
05/31/06	NH3-N (mo. avg. conc.)	21.44 mg/l	5 mg/l
05/31/06	NH3-N (7-day avg. conc.)	26.77 mg/l	7.5 mg/l
05/31/06	FCB (7-day geo mean.)	438.78 col/100 ml	400 col/100 ml
06/30/06	NH3-N (mo. avg. loading)	74.15 lbs/day	73 lbs/day
06/30/06	NH3-N (mo. avg. conc.)	17.67 mg/l	5 mg/l
06/30/06	NH3-N (7-day avg. conc.)	21.10 mg/l	7.5 mg/l
07/31/06	NH3-N (mo. avg. conc.)	16.47 mg/l	5 mg/l
07/31/06	NN3-N (7-day avg. conc.)	20.77 mg/l	7.5 mg/l
08/31/06	NH3-N (mo. avg. conc.)	16.34 mg/l	5 mg/l
08/31/06	NN3-N (7-day avg. conc.)	23.27 mg/l	7.5 mg/l
09/30/06	TSS (mo. avg. conc.)	34.25 mg/l	30 mg/l
09/30/06	TSS (7-day avg conc.)	46.67 mg/l	45 mg/l
09/30/06	NH3-N (mo. avg. conc.)	10.58 mg/l	5 mg/l
09/30/06	NH3-N (7-day avg. conc.)	16.85 mg/l	7.5 mg/l
10/31/06	NH3-N (mo. avg. conc.)	11.29 mg/l	5 mg/l
10/31/06	NH3-N (7-day avg. conc.)	13.53 mg/l	7.5 mg/l
05/31/07	NH3-N (mo. avg. conc.)	9.83 mg/l	5 mg/l
05/31/07	NH3-N (7-day avg. conc.)	15.83 mg/l	7.5 mg/l
06/30/07	NH3-N (mo. avg. conc.)	8.9 mg/l	5 mg/l
06/30/07	NH3-N (7-day avg. conc.)	10.3 mg/l	7.5 mg/l
07/31/07	NH3-N (mo. avg. conc.)	5.7 mg/l	5 mg/l
08/31/07	NH3-N (mo. avg. conc.)	5.14 mg/l	5 mg/l
09/30/07	NH3-N (7-day avg. conc.)	8.9 mg/l	7.5 mg/l
10/31/07	NH3-N (7-day avg. conc.)	9.3 mg/l	7.5 mg/l
10/31/07	NH3-N (mo. avg. conc.)	7.1 mg/l	5 mg/l

3. On April 11, 2007, the Department performed a routine compliance inspection of the permitted facility. The inspection revealed the following violations:

- a. At the time of the inspection, four blowers in the initial cell were not in operation. This is a violation of Part II, Section B, Paragraph 1 of the permit which requires the facility to be properly operated and maintained at all times.
 - b. The Permittee was not recording the pH and temperature values when performing calibration of the pH meter. This is a violation of Part II, Section C, Paragraph 3 and Part II, Section C, Paragraphs 7 and 8 of the permit.
 - c. The Permittee was not including the name and address of the contract laboratory on the DMRs as required by Part II, Section C, Paragraph 5 of the permit.
4. On November 16, 2007, the Department performed a routine compliance inspection of the permitted facility. At the time of the inspection, five blowers in pond two were not in operation. This is a violation of Part II, Section B, Paragraph 1 of the permit which requires the facility to be properly operated and maintained at all times.
 5. The wastewater treatment plant operated by the Permittee has a design capacity of 1.75 million gallon per day (mgd). Since August 2004, the average daily flow has been 1.43 mgd or 83% of design. Peak flows have ranged as high as 19.195 mgd or approximately eleven (11) times the design flow. The average of the peak flows since August 2004 is 5.12 mgd or almost three (3) times the design flow. The extremely high peak flows indicate a significant problem with inflow into the wastewater treatment system and may be contributing to problems achieving consistent compliance with effluent limits.
 6. The Permittee has reported several sanitary sewer overflows (“SSOs”) since August of 2004. Sanitary sewer overflows are unpermitted discharges in violation of A.C.A. § 8-4-217(b)(1)(E). A list of the SSOs is attached to this Order.

7. The Permittee failed to achieve consistent compliance with final effluent limits for ammonia nitrogen as required by CAO LIS No. 03-076 and 03-076-001.
8. Part I, Section A of the permit, as reissued effective March 1, 2008, requires the Permittee to sample outfall number 001 for dissolved oxygen ("DO"). The Permittee failed to submit DO sample testing results on the DMR it submitted to ADEQ for March 2008.
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. Upon the effective date of this Order, CAO LIS No. 03-076 and amendments are hereby closed and replaced by this Order.
2. Within thirty (30) days of the effective date of this Order, the Permittee shall submit to ADEQ a corrected DMR for March 2008 with the DO sampling required by the permit, or, if the Permittee did not sample for DO during that month, it shall instead submit a noncompliance report as required by the permit.
3. Within thirty (30) days of the effective date of this Order, the Permittee shall submit to ADEQ a comprehensive Corrective Action Report which shall detail the steps the Permittee took to achieve full compliance with the effluent characteristic limits of the permit.
4. If the Permittee determines that full compliance with the terms of the permit cannot be achieved within thirty (30) days of the effective date of this Order, the Permittee shall submit to ADEQ a comprehensive plan, with milestone schedule in lieu of the corrective action report

required by Paragraph 3 above. The plan shall detail the steps the Permittee shall take to achieve compliance with the terms of the permit and to eliminate the effluent characteristics violations cited in Paragraph 2 of the Findings of Fact and to prevent future violations. Upon approval by ADEQ, the submitted milestone schedule shall be incorporated into this Order by reference and shall be followed by the Permittee. Failure to comply with the schedule, as approved by ADEQ, shall be subject to the stipulated penalties contained in Paragraph 11 below.

5. Within thirty (30) days of the effective date of this Order, the Permittee shall submit to ADEQ a comprehensive Corrective Action Plan which shall detail the steps the Permittee shall take to eliminate peak flows caused by inflow and infiltration. This plan shall at a minimum include the following items:

a. The Permittee shall complete a comprehensive collection system evaluation within one (1) year of the effective date of this order. This comprehensive collection system evaluation shall identify all wastewater mains and pumping stations that cannot carry peak hydraulic loads caused by inflow and infiltration. The evaluation shall also identify all pumping stations that do not have auxiliary power or sufficient storage as required by Part II, Section B, Paragraph 7 of the permit and shall identify all pumping stations that do not have direct notification alarms.

b. The Permittee shall submit to the Department within fifteen (15) months of the effective date of this order a milestone schedule for the replacement and/or repair of all wastewater mains and pumping stations that cannot convey peak hydraulic loads as identified by the comprehensive collection system evaluation required in Paragraph 5a of this section. This milestone schedule shall include dates for the installation of direct notification alarms and auxiliary power or storage capacity at deficient pumping stations

identified during the collection system evaluation. Upon approval by ADEQ, the submitted milestone schedule shall be incorporated into this Order by reference and shall be followed by the Permittee. Failure to comply with the schedule, as approved by ADEQ, shall be subject to the stipulated penalties contained in Paragraph 11 below.

6. Within ninety (90) days of the effective date of this order, the Permittee shall establish and implement an overflow response plan which:
 - a. Identifies the individual(s) responsible for making the appropriate reports (24-hour notification and monthly tabular reports) to ADEQ,
 - b. Ensures that collection system overflows are identified and responded to in a timely manner,
 - c. Establishes written procedures for cleaning up after sanitary sewer overflows,
 - d. Has 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. Has provisions to notify any affected permit holders including municipal separate stormwater sewer permit (MS4) holders.
7. Within one (1) year the Permittee shall establish and maintain a minimum inventory of spare parts necessary to make immediate repairs to the pump stations, wastewater lines, and manholes. The Permittee shall submit this inventory list to the ADEQ upon completion of the inventory.
8. The Permittee shall at least every two (2) years reevaluate the wastewater collection system and make whatever changes are necessary to the corrective action plan and construction

projects to ensure the Permittee meets the goal of elimination of collection system overflows and problems related to peak hydraulic loads.

9. 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 Four Hundred Dollars (\$5,400)** as a voluntary civil penalty. Payment of the penalty shall be made within thirty (30) days of the effective date of this Order, made payable to the Arkansas Department of Environmental Quality, and mailed to:

The Fiscal Division
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, Arkansas 72118-5317

10. All submittals required by this Order 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 11 below.

11. Failure to meet the requirements, effluent limits or construction deadlines of this Order or the approved schedules provided for herein constitutes a violation of the Order. 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 Order.

12. 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 Order, 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.

13. ADEQ may grant an extension of any provision of this Order, 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 ADEQ promptly, as provided in Paragraph 12 of this section, shall be grounds for a denial of an extension.

14. This Order 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 final until thirty (30) days after public notice is given. ADEQ retains the right to rescind this Order 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.

15. 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 Order is granted by the Commission.

16. Nothing in this Order shall be construed as a waiver by ADEQ of its enforcement authority over alleged violations not specifically addressed herein. Also, this Order 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 29th DAY OF August, 2008.


Teresa Marks, Director

APPROVED AS TO FORM AND CONTENT:

BY: Mark Yardley
(Signature)

MARK YARDLEY
(Typed or printed name)

TITLE: DIRECTOR
(Typed or printed title)

DATE: 08-12-08

Bypass and SSO Report

Wednesday, August 27, 2008

by NPID Only

		Description	Cause	Actions
ar0021466		ALMA, CITY OF		Other Id/Permit Number: Name:
16048	start 4/10/2008	120000 gallons	<input checked="" type="checkbox"/> Capacity <input type="checkbox"/> Non-Capacity	<input type="checkbox"/> Bypass <input checked="" type="checkbox"/> SSO
	stop 4/10/2008		Arkansas River Flooding, Power outage	Restored power
Location:				
16457	start 4/10/2008	518400 gallons	<input type="checkbox"/> Capacity <input type="checkbox"/> Non-Capacity	<input type="checkbox"/> Bypass <input type="checkbox"/> SSO
	stop 5/1/2008	MH #36-W3 WAS PARTIALLY WASHED AWAY DUE TO HEAVY RAINS, CAUSING PIPE TO BREAK.	FLOODING RAINS FROM 4/9/08.	PERFORMED TEMPORARY REPAIR TO SEWER LINE, UNTIL SUCH TIME A CONTRACTOR IS HIRED AND A NEW MANHOLE AND SEWER LINE IS COMPLETED.
Location:				
15475	start 3/3/2008	6000 gallons	<input type="checkbox"/> Capacity <input type="checkbox"/> Non-Capacity	<input type="checkbox"/> Bypass <input type="checkbox"/> SSO
	stop 3/3/2008	1 - 2 HOUR OVERFLOW NEXT TO MANHOLE #27-E-8	UNKNOWN (MAY HAVE BEEN DUE TO ABOUT 4 INCHES OF RAINFALL)	N/A
Location:				
13816	start 5/21/2007	5000 gallons	<input type="checkbox"/> Capacity <input checked="" type="checkbox"/> Non-Capacity	<input type="checkbox"/> Bypass <input checked="" type="checkbox"/> SSO
	stop 5/21/2007	Discharge is ponding in low area of pature.	Excessive grease and other	Pressure rodded to remove blockage
Location: In pasture				
12624	start 11/17/2006	999 gallons	<input type="checkbox"/> Capacity <input checked="" type="checkbox"/> Non-Capacity	<input type="checkbox"/> Bypass <input checked="" type="checkbox"/> SSO
	stop 11/17/2006	Manhole overflow	Blockage caused by roots or grease	Pressure rodded to remove blockage and spread lime around manhole area
Location: Manhole 23-2-3				
12139	start 11/17/2006	1000 gallons	<input type="checkbox"/> Capacity <input checked="" type="checkbox"/> Non-Capacity	<input type="checkbox"/> Bypass <input checked="" type="checkbox"/> SSO
	stop 11/17/2006	Very small overflow at Manhole #23-2-3	Blockage caused by roots or grease	Pressure rodded to remove blockage and spread lime around manhole area.
Location:				

		<i>Description</i>	<i>Cause</i>	<i>Actions</i>	
11750	start	6/6/2006	1500 gallons	<input type="checkbox"/> Capacity <input checked="" type="checkbox"/> Non-Capacity	<input type="checkbox"/> Bypass <input checked="" type="checkbox"/> SSO
	stop	6/6/2006		equipment failure	repaired the equipment
Location: Collum Lane lift station					
11469	start	5/1/2006	2000 gallons	<input type="checkbox"/> Capacity <input checked="" type="checkbox"/> Non-Capacity	<input type="checkbox"/> Bypass <input checked="" type="checkbox"/> SSO
	stop	5/1/2006	overflow at Collum Lane Lift Station	electrical fuses blown on incoming power; possibly caused by lightning.	Electrician repaired pumps and electrical components
Location: Collum Lane, Alma					
10725	start	1/23/2006	50 gallons	<input type="checkbox"/> Capacity <input checked="" type="checkbox"/> Non-Capacity	<input type="checkbox"/> Bypass <input checked="" type="checkbox"/> SSO
	stop	1/23/2006	overflow at manhole # 21-11 near 814 E. Cherry St.	unknown blockage	pressure rodded main to remove blockage; small amount of water was around manhole-limed area.
Location:					
10554	start	1/5/2006	200 gallons	<input type="checkbox"/> Capacity <input checked="" type="checkbox"/> Non-Capacity	<input type="checkbox"/> Bypass <input checked="" type="checkbox"/> SSO
	stop	1/5/2006	overflow at 222 Main St., Manhole 27-1-3	unknown blockage in line	pressure cleaned sewer main to remove blockage, spread lime in ditch area, no standing water
Location:					
10270	start	10/17/2005	2160 gallons	<input type="checkbox"/> Capacity <input checked="" type="checkbox"/> Non-Capacity	<input type="checkbox"/> Bypass <input checked="" type="checkbox"/> SSO
	stop	10/17/2005	manhole #21-10-1 in grassy field on south side of Hwy. 64 B overflowed	blockage due to grease and roots	pressure cleaned and chmically treated for roots and grease
Location:					
10032	start	8/12/2005	15 gallons	<input type="checkbox"/> Capacity <input checked="" type="checkbox"/> Non-Capacity	<input type="checkbox"/> Bypass <input checked="" type="checkbox"/> SSO
	stop	8/12/2005	823 Highway 71 North	blockage	Jet rodded line to eliminate the blockage
Location:					
9856	start	6/17/2005	1800 gallons	<input type="checkbox"/> Capacity <input checked="" type="checkbox"/> Non-Capacity	<input type="checkbox"/> Bypass <input checked="" type="checkbox"/> SSO
	stop	6/17/2005	35 Column Lane pump station	Power outage - lightning	Replaced damaged control components & wiring
Location:					
9211	start	1/28/2005	300 gallons	<input type="checkbox"/> Capacity <input checked="" type="checkbox"/> Non-Capacity	<input type="checkbox"/> Bypass <input checked="" type="checkbox"/> SSO
	stop	1/28/2005	Highway 64 East, manhole #21-14	Blockage	Jet rodded line to eliminate the blockage
Location:					

		<i>Description</i>	<i>Cause</i>	<i>Actions</i>	
8866	<i>start</i>	11/18/2004	360 gallons	<input type="checkbox"/> Capacity <input checked="" type="checkbox"/> Non-Capacity	<input type="checkbox"/> Bypass <input checked="" type="checkbox"/> SSO
	<i>stop</i>	11/18/2004	Highway 64 East	Blockage & heavy rainfall	Jet rodded line to eliminate the blockage
Location:					
8865	<i>start</i>	11/15/2004	2160 gallons	<input type="checkbox"/> Capacity <input checked="" type="checkbox"/> Non-Capacity	<input type="checkbox"/> Bypass <input checked="" type="checkbox"/> SSO
	<i>stop</i>	11/15/2004	1034 Highway 71 North	blockage	Jet rodded line to eliminate the blockage and lime applied to the area
Location:					
8864	<i>start</i>	11/1/2004	900 gallons	<input checked="" type="checkbox"/> Capacity <input type="checkbox"/> Non-Capacity	<input checked="" type="checkbox"/> Bypass <input type="checkbox"/> SSO
	<i>stop</i>	11/1/2004	Mulberry Street	Heavy rains and grease	Jet rodded line to eliminate the blockage
Location:					
8322	<i>start</i>	8/27/2004	1000 gallons	<input type="checkbox"/> Capacity <input type="checkbox"/> Non-Capacity	<input type="checkbox"/> Bypass <input type="checkbox"/> SSO
	<i>stop</i>	8/28/2004	Kimes Field - Highway 71 North	Roots or grease	Jet rodded line from both directions eliminating the blockage, limed the area around the manhole
Location:					
8156	<i>start</i>	6/3/2004	720 gallons	<input type="checkbox"/> Capacity <input type="checkbox"/> Non-Capacity	<input type="checkbox"/> Bypass <input type="checkbox"/> SSO
	<i>stop</i>	6/3/2004	3903 Highway 64 East	Air release valve stuck open	Limed the area
Location:					
8070	<i>start</i>	5/25/2004	4320 gallons	<input type="checkbox"/> Capacity <input type="checkbox"/> Non-Capacity	<input type="checkbox"/> Bypass <input type="checkbox"/> SSO
	<i>stop</i>	5/25/2004	East of Harris Drive - J.W. Harris field	grease	Jet rodded line to eliminate the blockage, limed area, located manhole for proper future maintenance
Location:					
8069	<i>start</i>	5/12/2004	5040 gallons	<input type="checkbox"/> Capacity <input type="checkbox"/> Non-Capacity	<input type="checkbox"/> Bypass <input type="checkbox"/> SSO
	<i>stop</i>	5/12/2004	East of Harris Drive - J.W. Harris field	Grease	Jet rodded line to eliminate the blockage
Location:					
7986	<i>start</i>	4/29/2004	50 gallons	<input type="checkbox"/> Capacity <input type="checkbox"/> Non-Capacity	<input type="checkbox"/> Bypass <input type="checkbox"/> SSO
	<i>stop</i>	4/29/2004	Highway 64 East	Grease	Jet rodded line to eliminate the blockage and raked around the manhole
Location:					

	<i>Description</i>	<i>Cause</i>	<i>Actions</i>	
7985	<i>start</i> 4/6/2004 <i>stop</i> 4/6/2004	2880 gallons Highway 71 in the field	<input type="checkbox"/> Capacity <input type="checkbox"/> Non-Capacity Roots	<input type="checkbox"/> Bypass <input type="checkbox"/> SSO Jet rodded line to eliminate the blockage, limed the area
Location:				
7702	<i>start</i> 2/10/2004 <i>stop</i> 2/10/2004	100 gallons Highway 64 @ Middle School	<input type="checkbox"/> Capacity <input type="checkbox"/> Non-Capacity Grease	<input type="checkbox"/> Bypass <input type="checkbox"/> SSO Jet rodded line to eliminate the blockage.
Location:				
6854	<i>start</i> 6/30/2003 <i>stop</i> 6/30/2003	180 gallons Chitwood & Memory Lane	<input type="checkbox"/> Capacity <input type="checkbox"/> Non-Capacity Grease or roots	<input type="checkbox"/> Bypass <input type="checkbox"/> SSO Jet rodded line to eliminate the blockage and limed area
Location:				
6063	<i>start</i> 12/2/2002 <i>stop</i> 12/2/2002	720 gallons Harris Field east of Harris Drive	<input type="checkbox"/> Capacity <input type="checkbox"/> Non-Capacity Blockage	<input type="checkbox"/> Bypass <input type="checkbox"/> SSO Jet rodded line to eliminate the blockage, chemically treated sewer line to reduce grease buildup and limed the area
Location:				
5870	<i>start</i> 11/27/2002 <i>stop</i> 11/28/2002	1500 gallons Harris Field east of Harris Dr., between manhole 17 & 17-1	<input type="checkbox"/> Capacity <input type="checkbox"/> Non-Capacity Blockage	<input type="checkbox"/> Bypass <input type="checkbox"/> SSO Jet rodded line to eliminate the blockage and limed the area
Location:				
5555	<i>start</i> 8/26/2002 <i>stop</i> 8/27/2002	43200 gallons Uptown lift station	<input type="checkbox"/> Capacity <input type="checkbox"/> Non-Capacity Power outage & circuit breaker	<input type="checkbox"/> Bypass <input type="checkbox"/> SSO Reset tripped circuit breakers & started both submersible pumps
Location:				
5264	<i>start</i> 4/24/2002 <i>stop</i> 4/25/2002	14400 gallons 26 Squires St.	<input type="checkbox"/> Capacity <input type="checkbox"/> Non-Capacity Blockage	<input type="checkbox"/> Bypass <input type="checkbox"/> SSO Pressure rodded line to eliminate the blockage, limed area & added to regular maintenance list
Location:				
5142	<i>start</i> 3/19/2002 <i>stop</i> 3/19/2002	2400 gallons Belle Ave. & Norman Circle	<input type="checkbox"/> Capacity <input type="checkbox"/> Non-Capacity blockage & 2" of rain	<input type="checkbox"/> Bypass <input type="checkbox"/> SSO Jet rodded line to eliminate the blockage and limed the area
Location:				

		<i>Description</i>	<i>Cause</i>	<i>Actions</i>
4702	start	1/29/2002	2400 gallons	<input type="checkbox"/> Capacity <input type="checkbox"/> Non-Capacity <input type="checkbox"/> Bypass <input type="checkbox"/> SSO
	stop	1/29/2002	800 Block of Highway 71 north	Blockage Pressure rodded main to eliminate the blockage, applied lime to the area
Location:				
4539	start	12/18/2001	3600 gallons	<input type="checkbox"/> Capacity <input type="checkbox"/> Non-Capacity <input type="checkbox"/> Bypass <input type="checkbox"/> SSO
	stop	12/18/2001	West Side Highway 71 North - Kimes Field	Roots or Grease Applied lime & placed on maintenance schedule for chemical treatment
Location:				
3986	start	8/20/2001	3600 gallons	<input type="checkbox"/> Capacity <input type="checkbox"/> Non-Capacity <input type="checkbox"/> Bypass <input type="checkbox"/> SSO
	stop	8/20/2001	East Collum Lane Lift Station	Electrical problem Limed area and repaired electrical problem
Location:				
3848	start	8/3/2001	1800 gallons	<input type="checkbox"/> Capacity <input type="checkbox"/> Non-Capacity <input type="checkbox"/> Bypass <input type="checkbox"/> SSO
	stop	8/3/2001	East Collum Lane Lift Station	Electrical Repaired electrical problem
Location:				
3867	start	6/5/2001	2400 gallons	<input type="checkbox"/> Capacity <input type="checkbox"/> Non-Capacity <input type="checkbox"/> Bypass <input type="checkbox"/> SSO
	stop	6/5/2001	Maple Shade @ manhole #62	Roots Removed blockage, limed area & treated line with chemical root killer
Location:				
3800	start	5/15/2001	2700 gallons	<input type="checkbox"/> Capacity <input type="checkbox"/> Non-Capacity <input type="checkbox"/> Bypass <input type="checkbox"/> SSO
	stop	5/15/2001	Highway 64 East manhole #21-14-1	Grease blockage Removed blockage
Location:				
3660	start	3/5/2001	3600 gallons	<input type="checkbox"/> Capacity <input type="checkbox"/> Non-Capacity <input type="checkbox"/> Bypass <input type="checkbox"/> SSO
	stop	3/5/2001	Manhole #45 behind Day's Gone By - Heather Lane	Roots Removed root blockage, treated line with root killer, limed area & put on regular maintenance list
Location:				
3572	start	2/24/2001	19200 gallons	<input type="checkbox"/> Capacity <input type="checkbox"/> Non-Capacity <input type="checkbox"/> Bypass <input type="checkbox"/> SSO
	stop	2/24/2001	Heather Lane	Heavy rainfall Continue to work on I&I in area & to enlarge transmission lines
Location:				

		<i>Description</i>	<i>Cause</i>	<i>Actions</i>
3571	<i>start</i>	2/16/2001	14400 gallons	<input type="checkbox"/> Capacity <input type="checkbox"/> Non-Capacity <input type="checkbox"/> Bypass <input type="checkbox"/> SSO
	<i>stop</i>	2/17/2001	Meadors Drive	Heavy rainfall Continue to work on I&I in area & to enlarge transmission lines
Location:				
3570	<i>start</i>	2/16/2001	14400 gallons	<input type="checkbox"/> Capacity <input type="checkbox"/> Non-Capacity <input type="checkbox"/> Bypass <input type="checkbox"/> SSO
	<i>stop</i>	2/17/2001	Meadors Circle	Heavy rainfall Continue to work on I&I in area & to enlarge transmission lines
Location:				

CITY OF ALMA WATER & SEWR DEPT
EMERGENCY FUND ACCT.
811 FAYETTEVILLE AVE
ALMA, AR 72921-3604

8/15 CAD
8T-54/820
5750408212

1146

DATE 8-13-08

PAY TO THE ORDER OF Arkansas Dept. of Environmental Quality \$ 5400.00

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ADEQ

ARKANSAS
Department of Environmental Quality

TO: Teresa Marks, Director

THROUGH: Dawn Guthrie, Attorney, Legal Division 

FROM: Anne Roberts, Water Enforcement Administrator 

SUBJECT: Request for Signature on Previously Approved CAO for City of Alma

DATE: August 27, 2008

Please execute the attached CAO, which has been signed by the permittee's cognizant official, the public works director for the City of Alma. Nothing in the CAO has been changed since its final approval, and the \$5,400 penalty has already been received.

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY

IN THE MATTER OF:

**CITY OF ALMA
CRAWFORD COUNTY**

**LIS NO. 08-105
AFIN 17-00059**

CONSENT ADMINISTRATIVE ORDER

This Consent Administrative Order ("Order") is issued pursuant to the authority of the Arkansas Water and Air Pollution Control Act (Act 472 of 1949, as amended; Ark. Code Ann. §8-4-101 et seq.) and the regulations issued thereunder (hereinafter collectively referred to as "the Act").

Pursuant to the authority of Ark. Code Ann. §8-4-207(1)(B), the Director for the Arkansas Department of Environmental Quality ("ADEQ") is authorized to set schedules of compliance for facilities permitted under the Act necessary to assure compliance with both applicable state and federal effluent limitations, including, but not limited to, those mandated by the National Pollutant Discharge Elimination System Program ("NPDES") under section 402 of the Federal Water Pollution Control Act, 33 U.S.C. 1342 as well as under sections 301, 318, and 405 of the Federal Water Pollution Control Act, 33 U.S.C. 1311, 33 U.S.C. 1328 and 33 U.S.C. 1345; and Arkansas Pollution Control and Ecology Commission Regulations 2, 6, 7 & 8.

The issues herein having been settled by the agreement of the City of Alma ("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 Alma is located in Crawford County. The Permittee operates a wastewater treatment facility pursuant to NPDES permit number AR0021466 ("the permit").

2. Violations of the effluent characteristic limits in Part I, Section A of the permit for outfall number 001, as found in Discharge Monitoring Reports (“DMRs”) submitted by the Permittee to ADEQ since March 2005, are as follows:

<u>DATE</u>	<u>PARAMETER</u>	<u>REPORTED</u>	<u>PERMITTED</u>
04/30/05	TSS (mo. avg. loading)	2156.06 lbs/day	438 lbs/day
04/30/05	TSS (mo. avg. conc.)	67.50 mg/l	30 mg/l
04/30/05	TSS (7-day avg. conc.)	193.33 mg/l	45 mg/l
05/31/05	TSS (mo. avg. conc.)	31.85 mg/l	30 mg/l
05/31/05	TSS (7-day avg. conc.)	47.67 mg/l	45 mg/l
05/31/06	NH3-N (mo. avg. conc.)	21.44 mg/l	5 mg/l
05/31/06	NH3-N (7-day avg. conc.)	26.77 mg/l	7.5 mg/l
05/31/06	FCB (7-day geo mean.)	438.78 col/100 ml	400 col/100 ml
06/30/06	NH3-N (mo. avg. loading)	74.15 lbs/day	73 lbs/day
06/30/06	NH3-N (mo. avg. conc.)	17.67 mg/l	5 mg/l
06/30/06	NH3-N (7-day avg. conc.)	21.10 mg/l	7.5 mg/l
07/31/06	NH3-N (mo. avg. conc.)	16.47 mg/l	5 mg/l
07/31/06	NN3-N (7-day avg. conc.)	20.77 mg/l	7.5 mg/l
08/31/06	NH3-N (mo. avg. conc.)	16.34 mg/l	5 mg/l
08/31/06	NN3-N (7-day avg. conc.)	23.27 mg/l	7.5 mg/l
09/30/06	TSS (mo. avg. conc.)	34.25 mg/l	30 mg/l
09/30/06	TSS (7-day avg conc.)	46.67 mg/l	45 mg/l
09/30/06	NH3-N (mo. avg. conc.)	10.58 mg/l	5 mg/l
09/30/06	NH3-N (7-day avg. conc.)	16.85 mg/l	7.5 mg/l
10/31/06	NH3-N (mo. avg. conc.)	11.29 mg/l	5 mg/l
10/31/06	NH3-N (7-day avg. conc.)	13.53 mg/l	7.5 mg/l
05/31/07	NH3-N (mo. avg. conc.)	9.83 mg/l	5 mg/l
05/31/07	NH3-N (7-day avg. conc.)	15.83 mg/l	7.5 mg/l
06/30/07	NH3-N (mo. avg. conc.)	8.9 mg/l	5 mg/l
06/30/07	NH3-N (7-day avg. conc.)	10.3 mg/l	7.5 mg/l
07/31/07	NH3-N (mo. avg. conc.)	5.7 mg/l	5 mg/l
08/31/07	NH3-N (mo. avg. conc.)	5.14 mg/l	5 mg/l
09/30/07	NH3-N (7-day avg. conc.)	8.9 mg/l	7.5 mg/l
10/31/07	NH3-N (7-day avg. conc.)	9.3 mg/l	7.5 mg/l
10/31/07	NH3-N (mo. avg. conc.)	7.1 mg/l	5 mg/l

3. On April 11, 2007, the Department performed a routine compliance inspection of the permitted facility. The inspection revealed the following violations:

- a. At the time of the inspection, four blowers in the initial cell were not in operation. This is a violation of Part II, Section B, Paragraph 1 of the permit which requires the facility to be properly operated and maintained at all times.
 - b. The Permittee was not recording the pH and temperature values when performing calibration of the pH meter. This is a violation of Part II, Section C, Paragraph 3 and Part II, Section C, Paragraphs 7 and 8 of the permit.
 - c. The Permittee was not including the name and address of the contract laboratory on the DMRs as required by Part II, Section C, Paragraph 5 of the permit.
4. On November 16, 2007, the Department performed a routine compliance inspection of the permitted facility. At the time of the inspection, five blowers in pond two were not in operation. This is a violation of Part II, Section B, Paragraph 1 of the permit which requires the facility to be properly operated and maintained at all times.
 5. The wastewater treatment plant operated by the Permittee has a design capacity of 1.75 million gallon per day (mgd). Since August 2004, the average daily flow has been 1.43 mgd or 83% of design. Peak flows have ranged as high as 19.195 mgd or approximately eleven (11) times the design flow. The average of the peak flows since August 2004 is 5.12 mgd or almost three (3) times the design flow. The extremely high peak flows indicate a significant problem with inflow into the wastewater treatment system and may be contributing to problems achieving consistent compliance with effluent limits.
 6. The Permittee has reported several sanitary sewer overflows (“SSOs”) since August of 2004. Sanitary sewer overflows are unpermitted discharges in violation of A.C.A. § 8-4-217(b)(1)(E). A list of the SSOs is attached to this Order.

7. The Permittee failed to achieve consistent compliance with final effluent limits for ammonia nitrogen as required by CAO LIS No. 03-076 and 03-076-001.
8. Part I, Section A of the permit, as reissued effective March 1, 2008, requires the Permittee to sample outfall number 001 for dissolved oxygen ("DO"). The Permittee failed to submit DO sample testing results on the DMR it submitted to ADEQ for March 2008.
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. Upon the effective date of this Order, CAO LIS No. 03-076 and amendments are hereby closed and replaced by this Order.
2. Within thirty (30) days of the effective date of this Order, the Permittee shall submit to ADEQ a corrected DMR for March 2008 with the DO sampling required by the permit, or, if the Permittee did not sample for DO during that month, it shall instead submit a noncompliance report as required by the permit.
3. Within thirty (30) days of the effective date of this Order, the Permittee shall submit to ADEQ a comprehensive Corrective Action Report which shall detail the steps the Permittee took to achieve full compliance with the effluent characteristic limits of the permit.
4. If the Permittee determines that full compliance with the terms of the permit cannot be achieved within thirty (30) days of the effective date of this Order, the Permittee shall submit to ADEQ a comprehensive plan, with milestone schedule in lieu of the corrective action report

required by Paragraph 3 above. The plan shall detail the steps the Permittee shall take to achieve compliance with the terms of the permit and to eliminate the effluent characteristics violations cited in Paragraph 2 of the Findings of Fact and to prevent future violations. Upon approval by ADEQ, the submitted milestone schedule shall be incorporated into this Order by reference and shall be followed by the Permittee. Failure to comply with the schedule, as approved by ADEQ, shall be subject to the stipulated penalties contained in Paragraph 11 below.

5. Within thirty (30) days of the effective date of this Order, the Permittee shall submit to ADEQ a comprehensive Corrective Action Plan which shall detail the steps the Permittee shall take to eliminate peak flows caused by inflow and infiltration. This plan shall at a minimum include the following items:

a. The Permittee shall complete a comprehensive collection system evaluation within one (1) year of the effective date of this order. This comprehensive collection system evaluation shall identify all wastewater mains and pumping stations that cannot carry peak hydraulic loads caused by inflow and infiltration. The evaluation shall also identify all pumping stations that do not have auxiliary power or sufficient storage as required by Part II, Section B, Paragraph 7 of the permit and shall identify all pumping stations that do not have direct notification alarms.

b. The Permittee shall submit to the Department within fifteen (15) months of the effective date of this order a milestone schedule for the replacement and/or repair of all wastewater mains and pumping stations that cannot convey peak hydraulic loads as identified by the comprehensive collection system evaluation required in Paragraph 5a of this section. This milestone schedule shall include dates for the installation of direct notification alarms and auxiliary power or storage capacity at deficient pumping stations

identified during the collection system evaluation. Upon approval by ADEQ, the submitted milestone schedule shall be incorporated into this Order by reference and shall be followed by the Permittee. Failure to comply with the schedule, as approved by ADEQ, shall be subject to the stipulated penalties contained in Paragraph 11 below.

6. Within ninety (90) days of the effective date of this order, the Permittee shall establish and implement an overflow response plan which:
 - a. Identifies the individual(s) responsible for making the appropriate reports (24-hour notification and monthly tabular reports) to ADEQ,
 - b. Ensures that collection system overflows are identified and responded to in a timely manner,
 - c. Establishes written procedures for cleaning up after sanitary sewer overflows,
 - d. Has 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. Has provisions to notify any affected permit holders including municipal separate stormwater sewer permit (MS4) holders.
7. Within one (1) year the Permittee shall establish and maintain a minimum inventory of spare parts necessary to make immediate repairs to the pump stations, wastewater lines, and manholes. The Permittee shall submit this inventory list to the ADEQ upon completion of the inventory.
8. The Permittee shall at least every two (2) years reevaluate the wastewater collection system and make whatever changes are necessary to the corrective action plan and construction

projects to ensure the Permittee meets the goal of elimination of collection system overflows and problems related to peak hydraulic loads.

9. 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 Four Hundred Dollars (\$5,400)** as a voluntary civil penalty. Payment of the penalty shall be made within thirty (30) days of the effective date of this Order, made payable to the Arkansas Department of Environmental Quality, and mailed to:

The Fiscal Division
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, Arkansas 72118-5317

10. All submittals required by this Order 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 11 below.

11. Failure to meet the requirements, effluent limits or construction deadlines of this Order or the approved schedules provided for herein constitutes a violation of the Order. 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 Order.

12. 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 Order, 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.

13. ADEQ may grant an extension of any provision of this Order, 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 ADEQ promptly, as provided in Paragraph 12 of this section, shall be grounds for a denial of an extension.

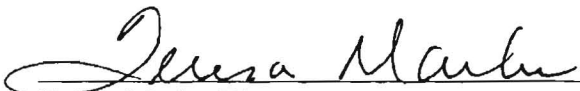
14. This Order is subject to public review and comment in accordance with A.C.A. §8-4-103 (d) and Arkansas Pollution Control and Ecology Commission Regulation No. 8 and shall not be final until thirty (30) days after public notice is given. ADEQ retains the right to rescind this Order based upon the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

15. 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 Order is granted by the Commission.

16. Nothing in this Order shall be construed as a waiver by ADEQ of its enforcement authority over alleged violations not specifically addressed herein. Also, this Order 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 29th DAY OF August, 2008.


Teresa Marks, Director

APPROVED AS TO FORM AND CONTENT:

BY: Mark Yardley
(Signature)

MARK YARDEY
(Typed or printed name)

TITLE: DIRECTOR
(Typed or printed title)

DATE: 08-12-08

ADEQ

ARKANSAS
Department of Environmental Quality

July 29, 2008

The Honorable John R. Ballentine
City of Alma
811 Fayetteville Avenue
Alma, AR 72921

RE: NPDES Permit No AR0021466, AFIN 17-00059
Proposed Consent Administrative Order

Dear Mayor Ballentine:

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 Four Hundred Dollars (\$5,400) 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 **August 6, 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.

Sincerely,



Anne Roberts
Enforcement Administrator
Enforcement Section
Water Division

Enclosure

Roberts, Anne

From: Garner, Cindy
Sent: Thursday, August 07, 2008 8:04 AM
To: Roberts, Anne
Subject: RE: City of Alma Consent Order (AR0021466)

Anne,

No, I don't believe that we should remove the provision for the I & I language for a couple of reasons. One, it is just good business practice to have a program in place and adhered to so that I & I doesn't become a problem, if it isn't all ready. Second, SSOs are a national priority of EPA and we should be putting that language in every CAO we write on NPDES facilities. If they have had a complete system evaluation completed within the last two years, then the language can be changed to something that ensures us that they have a continuing process.

They need to be sure that they communicate with the permits branch prior to relocating their flow measuring equipment.

Cindy

-----Original Message-----

From: Roberts, Anne
Sent: Wednesday, August 06, 2008 2:34 PM
To: Garner, Cindy
Subject: FW: City of Alma Consent Order (AR0021466)

In their response to the CAO, Alma said their flow measurements in their DMRs were way overstated because "rain runoff from the 52 acres of overland flow fields surcharges the structure where the transducer is located." (They are moving the transducer.) In the proposed CAO, we require them to address I&I, but they say they don't have a problem with I&I. They don't have an inordinate number of SSOs, and the main reason we required them to do a comprehensive collection system evaluation was because of the excessive flow. So, are you okay with removing that provision from the CAO?

Anne Roberts

Enforcement Administrator
 Water Division
 Arkansas Dept. of Environmental Quality (ADEQ)
 5301 Northshore Drive
 North Little Rock, AR 72118
 Telephone: (501) 682-0632
 Fax: (501) 682-0910

-----Original Message-----

From: Roberts, Anne
Sent: Wednesday, August 06, 2008 1:43 PM
To: 'Mark Yardley'
Subject: RE: City of Alma Consent Order

Mark,

Thanks for the clarification. I understand your concern, and though I can't make the decision about whether ADEQ would agree to removing the comprehensive collection system evaluation provision from the CAO, I certainly am willing to discuss the matter.

Anne Roberts

Enforcement Administrator
 Water Division
 Arkansas Dept. of Environmental Quality (ADEQ)
 5301 Northshore Drive
 North Little Rock, AR 72118
 Telephone: (501) 682-0632
 Fax: (501) 682-0910

-----Original Message-----

From: Mark Yardley [mailto:almapw@centurytel.net]
Sent: Wednesday, August 06, 2008 1:02 PM
To: Roberts, Anne
Cc: Neal Morrison; Jay Christello; tony
Subject: Re: City of Alma Consent Order

Anne,

Thank you so much for your response. I know that it is hard to interpret attitude in an email, so I hope that my email didn't sound unappreciative. We are very appreciative of any consideration we get in this matter. The fine was greatly reduced and we are very appreciative. I guess the requirement of studying the collection system hydraulics was my concern. We truly believe that we are not anywhere close to hydraulic overloading.

Over the next week we will visit with Neal Morrison to discuss comments in this area. We will have our response to you as soon as we possibly can; certainly before the deadline.

Thanks again,

Mark

----- Original Message -----

From: Roberts, Anne
To: Mark Yardley
Cc: [tony](#) ; [Jay Christello](#) ; [Neal Morrison](#)
Sent: Tuesday, August 05, 2008 3:25 PM
Subject: RE: City of Alma Consent Order

Mark,

Indeed we did take into consideration your explanations regarding excess flow, but they did not convince us that Alma's penalty for Sanitary Sewer Overflows should be reduced to \$0, as you suggested. SSOs are unpermitted discharges, which are serious violations. Additionally, because SSOs are untreated sewage, they represent an extremely high potential for adverse effects on human health and the environment.

We believe we are being more than fair in reducing your initial penalty of \$12,200 by 56% to \$5,400.

You may take until **Friday, August 15** to decide whether to sign the CAO. By that date, please return the signed CAO to me or let me know Alma will not agree to the CAO so that we may proceed with a Notice of Violation.

Thanks.

Anne Roberts

Enforcement Administrator

Water Division

Arkansas Dept. of Environmental Quality (ADEQ)

5301 Northshore Drive

North Little Rock, AR 72118

Telephone: (501) 682-0632

Fax: (501) 682-0910

-----Original Message-----

From: Mark Yardley [mailto:almapw@centurytel.net]

Sent: Tuesday, August 05, 2008 11:48 AM

To: Roberts, Anne

Cc: tony; Jay Christello; Neal Morrison

Subject: Re: City of Alma Consent Order

Anne,

I just received the new consent order today, August 5. I have not had a chance to discuss the new provisions with our engineer, Neal Morrison.

Upon initial review, it appears that our explanations concerning excess flow at the wastewater plant were not considered. It appears that there is still a misunderstanding about hydraulic loading in the collection system.

Please allow us a week or two to review the information with our engineer and submit further information concerning the hydraulic issue. We appreciate your consideration.

Thanks,

Mark Yardley
City of Alma

Alma's Counter Offer

Violation #1

Item A – Alma has proposed reducing this item from 6 to 3. I disagree with this reduction. Although the Department has no documentation of a water quality violation, we have no proof they did not occur. Permit limits are designed to be protective of water quality and when the permittee exceeds permit limits the potential for water quality violations increase. Additionally, the City of Alma should be aware that the Department grouped all effluent violations and treated them as one for the purpose of penalty calculation, which resulted in a significant reduction in the potential penalty for this violation. I believe 6 is an accurate score.

Item B – I don't have a problem with the proposed reduction from 2 to 1.

Item C – I don't agree with the position Alma has done everything in its power to correct the noncompliance. The (and budget) comment in C clearly indicates that it was a constraint to compliance. I would agree to a compromise value of 3 here.

Item D – Alma admits that contractor disputes have caused the delay. The City should have sought an alternative solution since these kinda of disputes can take years to resolve. They have proposed reducing the score of 3 to 1. I don't agree.

Item E – This is history and a score of 5 for permittees with a past history of formal enforcement for one of the issues raised in the proposed CAO. I don't agree with their proposed reduction.

Item F – I don't have a problem with the proposed reduction from 1 to 0.

Item J – The City of Alma wants a reduction from 5 to 0. We could only support this if compliance was not delayed. I would support a reduction to 3 to match item C.

Violation #1 – Agreeable alternative penalty is \$2100.

Violation #2

Item A – I don't agree with their proposed scoring of 3 instead of 6 we proposed. This is clearly a serious violation.

Item B – I don't have a problem with the proposed reduction from 2 to 1.

Item C – I don't agree with the proposed reduction from 2 to 0. The 2 is because the violation has not been addressed expeditiously. A higher score would have been proposed if the City was not being cooperative.

Item D – Alma admits that contractor disputes have caused the delay. The City should have sought an alternative solution since these kinda of disputes can take years to resolve. They have proposed reducing the score of 3 to 1. I don't agree.

Item E – This is history and a score of 5 for permittees with a past history of formal enforcement for one of the issues raised in the proposed CAO. I don't agree with their proposed reduction.

Item F – I don't have a problem with the proposed reduction from 1 to 0.

Item J – I don't agree with changing score from 1 to 0. Again, compliance was delayed.

Violation #2 – Agreeable alternative penalty is \$1800.

Violation #3

We cannot agree to zero for this violation.

Item A – A score of 1 is reasonable.

Item B – I don't have a problem with a proposed reduction from 2 to 1 to be consistent with the other two violations, however, I do not agree to a reduction of zero.

Item D – The City has proposed a reduction from 3 to 0. I do not agree. The City states noncompliance with ammonia standards has nothing to do with pH meter calibration. I disagree. Without documentation of proper pH meter calibration, one cannot be certain that the pH meter is reading proper. Considering the relationship between alkalinity and nitrification, inaccurate pH readings could contribute to improper operations and a failure to recognize pH trending down as alkalinity is depleted by the nitrification process.

Item E - History must be consistent throughout, therefore I stand by the score of 5.

Item F – The city claims the violation was not due to an omission and certainly was not intentional. Then what was the cause. I'm not sure they understand that an omission is primarily an oversight versus an intentional act. I believe it was an omission and stand by the score of 1

Violation #3 – Agreeable alternative penalty \$1100

These same arguments and agreeable alternative penalty apply to violations #4.

Violation #5 – The City of Alma has proposed a reduction from \$2500 to 0. Based upon the fact that this is not a requirement in the recently issued permit and Chuck Bennett's letter dated January 27, 2003 I agree that this violation should be removed from the CAO and the penalty for this violation withdrawn.

Violation #6 – The City is proposing to reduce the penalty from \$2600 to 0. I don't agree with this.

Item A – The City states the violation appears to be related to inaccurate flow measurement. While we did use the flow information submitted by the city to support our contention that the city has an I&I problem, this was not considered when proposing the penalty. SSOs are unpermitted discharges, which are serious violations. Additionally, because SSO represent untreated sewage, there is an extremely high potential for effects on human health and the environment. I stand by the score of 6.

Item B – The City has proposed reducing this score from 2 to 0. I do not agree, however, I would agree to a score of 1 for this item.

Item C – I don't agree with the proposed reduction from 1 to 0.

Item D – The City does not seem to understand that item D and E are related to history. Further more, I disagree with the City's contention that SSOs have little or nothing to do with ammonia. Inflow and infiltration (I&I), which contributes to the number and severity of SSOs, also contributes to effluent violations. I&I can disrupt food to microorganism ratio, cause temperature and pH shocks, wash out bacteria and food, and dilute the alkalinity to a point where the nitrification process is disrupted. Also, because of the issues with their flow monitoring it is difficult to accurately assess the actual scope of their I&I problem. I stand by the score of three.

Item E – See my response to D above and item E for previous violations.

Item F – The City has proposed reducing the score from 3 to 0. I do not agree with this. EPA is requiring facilities to eliminate wet weather and dry weather overflows. I would agree to a reduction to a score of 1 here.

Item G – I don't agree that the City has not had economic benefit, however, since we cannot quantify what that benefit is, I would agree to their proposed score of zero.

Item J – I don't agree with their proposed reduction from 3 to 0. I would accept a score of 2 here just to settle. The City claims it has an ongoing maintenance plan in effect, but it is not supplied here.

Violation #6 – Agreeable alternative penalty is \$1900 with the understanding the City will supply you with their maintenance plan which they state is in effect and a schedule that will insure accurate flow readings.

Comparison of originally proposed penalty by ADEQ, alternative penalty proposed by Alma, and our counter offer based upon the information submitted by the City of Alma.

Violation #	ADEQ's Original Penalty Proposal	Alma's Counter offer	What ADEQ agrees with
#1	\$2600	\$900	\$2100
#2	\$2000	\$700	\$1800
#3	\$1200	\$0	\$1100
#4	\$1200	\$0	\$1100
#5	\$2500	\$0	\$0
#6	\$2600	\$0	\$1900
Total;	\$12100.00	\$1600.00	\$8000.00

This is a 33% reduction in the proposed penalty which means it must be approved by Teresa.



ARKANSAS
Department of Environmental Quality

December 12, 2007

Mark Yardley, Public Works Director
City of Alma
811 Fayetteville Ave.
Alma, AR 72921

AFIN: 17-00059

NPDES Permit No.: AR0021466

Dear Mr. Yardley:

On November 16, 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 the following violations:

1. The plant is experiencing on going problems with the blowers in pond two. At time of inspection, five blowers were not in operation. According to the operator mechanical issues appear to be the source of the persistent problems with these treatment units. Steps must be taken to ensure that all needed blowers are in service and functioning properly.
2. After reviewing the July 2007 Discharge Monitoring Report, a permit excursion was noted in regard to the monthly average concentration on Ammonia Nitrogen. Facility reported 5.7 mg/l, while the permit limit is 5.0 mg/l. Although this violation was reported to the Department, the facility must take all reasonable measures to eliminate any future permit excursions.

Also noted during the inspection was the on going construction in regard to the ponds and the elimination of the overland system at the plant. Once construction is completed, please notify my office.

The above items require your immediate attention. Please submit a written response to these findings to the Water Division Enforcement Section of this Department.

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 28, 2007.

Yardley, City of Alma
December 12, 2007
Page 2

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 479-452-4822 ext. 11.

Sincerely,



Jeff Tyler
District 4 Field Inspector
Water Division

cc: Water Division Enforcement Branch
Water Division Permits Branch

 <p style="text-align: center;">UNITED STATES ENVIRONMENTAL PROTECTION AGENCY Washington, D.C. 20460</p> <h2 style="text-align: center;">NPDES Compliance Inspection Report</h2>	Form Approved OMB No. 2040-0003
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Section A: National Data System Coding																													
Transaction Code			NPDES								Yr/Mo/Day					Inspec. Type		Inspector		Fac. Type									
1	N	2	5	3	A	R	0	0	2	1	4	6	6	11	12	0	7	1	1	1	6	17	18	C	19	S	20	1	
Remarks																													
A F I N 1 7 - 0 0 0 5 9																													
Inspection Work Days				Facility Evaluation Rating				BI		QA		-----Reserved-----																	
67	0	0	1	69	70	3	71	N	72	N	73		74		75														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>) City of Alma POTW 2500 Orrick Road Alma, AR 72921	<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:50%;">Entry Time/Date 0900 / November 16, 2007</td> <td style="width:50%;">Permit Effective Date November 01, 2007</td> </tr> <tr> <td>Exit Time/Date 1530 / November 16, 2007</td> <td>Permit Expiration Date October 31, 2007</td> </tr> </table>	Entry Time/Date 0900 / November 16, 2007	Permit Effective Date November 01, 2007	Exit Time/Date 1530 / November 16, 2007	Permit Expiration Date October 31, 2007
Entry Time/Date 0900 / November 16, 2007	Permit Effective Date November 01, 2007				
Exit Time/Date 1530 / November 16, 2007	Permit Expiration Date October 31, 2007				
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Tony Maxwell / Chief Operator, / 479-632-2267 / cell 479-285-0370	Other Facility Data Coordinates: Outfall 001 N 35°26'43" W 94°09'33"				
Name, Address of Responsible Official/Title/Phone and Fax Number Mark Yardley / Public Works Director / 479-632-2254 / fax 479-632-5136 811 Fayetteville Ave. Alma, AR 72921	Contacted Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>				

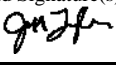
Section C: Areas Evaluated During Inspection							
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)							
S	Permit	S	Flow Measurement	U	Operations & Maintenance	S	Sampling
S	Records/Reports	S	Self-Monitoring Program	N	Sludge Handling/Disposal	N	Pollution Prevention
S	Facility Site Review	S	Compliance Schedules	N	Pretreatment	N	Multimedia
S	Effluent/Receiving Waters	S	Laboratory	N	Storm Water	N	Other:

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

Section C-Operations and Maintenance- On-going problems exist with blowers in pond two. On date of inspection, five blowers were not in operation due to mechanical problems.

After reviewing July 2007 Discharge Monitoring Report, a permit excursion was noted in regard to the monthly average concentration of Ammonia Nitrogen. Facility reported 5.7mg/l, permit limit is 5.0mg/l. The Department was notified in regard to this violation.

On-going construction is being performed at the plant in regard to the treatment system. Existing ponds are being dug out and the overland system is being eliminated. The ponds will be introduced into the treatment process. Currently ponds are used for storage during rainfall events. Once improvements are completed the facility feels as if they will be able to meet permit limits on a consistent basis.

Name(s) and Signature(s) of Inspector(s) Jeff Tyler 	Agency/Office/Telephone/Fax AR Dept. of Environmental Quality-/Ft. Smith/ 479-452-4822 ext. 11 / 479-452-4827	Date December 6, 2007
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date

SECTION A: PERMIT VERIFICATION

PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS

S M U NA 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 |

SECTION B: RECORDKEEPING AND REPORTING EVALUATION

RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT

S M U NA NEDETAILS: Permit excursion was noted in regard to monthly average concentration of NH3-N (July 2007)

- | | |
|--|---|
| 1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE: | <input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE |
| a. DATES AND TIME(S) OF SAMPLING: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| b. EXACT LOCATION(S) OF SAMPLING: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| c. NAME OF INDIVIDUAL PERFORMING SAMPLING: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| d. ANALYTICAL METHODS AND TECHNIQUES: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| e. RESULTS OF CALIBRATIONS: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| f. RESULTS OF ANALYSES: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| g. DATES AND TIMES OF ANALYSES: | <input checked="" type="checkbox"/> Y <input 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 checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR: | <input checked="" type="checkbox"/> S <input type="checkbox"/> M <input 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 |

SECTION C: OPERATIONS AND MAINTENANCE

TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED

S M U NA NEDETAILS: On-going problems exist with the blowers in pond 2. Five down at time of inspection.

- | | |
|--|---|
| 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 checked="" type="checkbox"/> S <input 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 checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 5. ALL NEEDED TREATMENT UNITS IN SERVICE: | <input type="checkbox"/> S <input type="checkbox"/> M <input checked="" type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED: <u>1 Class III and 1 Class I</u> | <input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED: | <input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 8. OPERATION AND MAINTENANCE MANUAL AVAILABLE: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input 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/ <u>OVERFLOWS</u> OCCURRED AT THE PLANT OR IN THE <u>COLLECTION SYSTEM</u> IN THE LAST YEAR: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 12. IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED: <u>Monthly SSO report</u> | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 13. HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/ <u>OVERFLOWS</u> : | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input 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 NE

DETAILS:

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 checked="" type="checkbox"/> Y <input 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:	<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 NE

DETAILS:

1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED:TYPE OF DEVICE: <u>3' rect. Weir w/ end contr.</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 checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
4. CALIBRATION FREQUENCY ADEQUATE: <u>Date of last calibration (2-10-07)</u>	<input checked="" type="checkbox"/> Y <input 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: <u>one per month</u>	<input checked="" type="checkbox"/> Y <input 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 NE

DETAILS:

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 checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
4. QUALITY CONTROL PROCEDURES ADEQUATE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
5. DUPLICATE SAMPLES ARE ANALYZED \geq 10% OF THE TIME:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
6. SPIKED SAMPLES ARE ANALYZED \geq 10% OF THE TIME:	<input checked="" type="checkbox"/> Y <input 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>Data Testing</u>	<u>American Interplex</u>
b. LAB ADDRESS: <u>3434 Country Club Ave. Ft. Smith</u>	<u>8600 Kanis Road Little Rock</u>
c. PARAMETERS PERFORMED: <u>TSS,CBOD,FC,NH3-N</u>	<u>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 type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" 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	Light	Trace	Light	Light Brown	

SECTION H: SLUDGE DISPOSAL

SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS S M U NA NE

DETAILS: There has not been any recent sludge removal.

1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input 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 type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
2. TYPE OF SAMPLE: <input type="checkbox"/> GRAB:___ <input type="checkbox"/> COMPOSITE:___ METHOD:___ FREQUENCY:___	
3. SAMPLES PRESERVED:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
4. FLOW PROPORTIONED SAMPLES OBTAINED:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
6. SAMPLE REPRESENTATIVE OF VOLUME AND NATURE OF DISCHARGE:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
7. SAMPLE SPLIT WITH PERMITTEE:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" 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:

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:	11-16-07	Time:	1135	
-------	-----------------	-------	-------------	--

Head in Inches:	NA	Feet:	.35	
-----------------	-----------	-------	------------	--

Type & Size of Primary Flow Measurement Device:
3' Rectangular weir with end contractions

Name & Model of Secondary Flow Measurement Device:
Milltronics OCM III

Date of last Calibration of Secondary Flow Device: **February 10, 2007**

Recorded Flow at Date & Time Listed Above:	1.22 mgd	(Facility Flow Meter)
--	-----------------	-----------------------

Calculated Flow at Date & Time Listed Above:	1.306 mgd	
--	------------------	--

(Flow is calculated using flow charts in: ISCO Open Channel Flow Measurement Handbook-5th Edition, Table # 10-5)

% Error =	Recorded Value	-	Calculated Value	X 100	
	Calculated Value				

% Error =	1.222	-	1.306	X 100	
	1.306				

% Error =	-.084		X 100	
	1.306			

% Error =	-.064		X 100	
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% Error =	-6.43		%	
-----------	--------------	--	---	--

Comments: **OK, within +/- 10%**

Water Division NPDES Photographic Evidence Sheet							
---	--	--	--	--	--	--	--

Location:	City of Alma POTW-2500 Orrick Road						
------------------	------------------------------------	--	--	--	--	--	--

Photographer:	Jeff Tyler			Witness:	None		
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Photo #	1	Of	2	Date:	11-16-07	Time:	0950
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Description:	On going construction in pond three at the plant. Depth of the pond being increased.						
---------------------	--	--	--	--	--	--	--



Photographer:	Jeff Tyler			Witness:	None		
----------------------	------------	--	--	-----------------	------	--	--

Photo #	2	Of	2	Date:	11-16-07	Time:	1015
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Description:	One of the five blowers in pond two which was not in operation at time of the inspection.						
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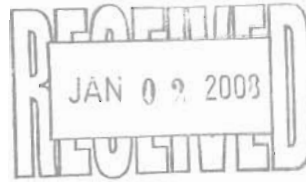
037389
JT



1 Fayetteville Ave
Alma, Arkansas 72921

(501) 632-2254
Fax (501) 632-5136

Water Division Enforcement Section
Arkansas Dept of Environmental Quality
301 Northshore Dr
Little Rock, Arkansas 72118-5317



December 27, 2007

Dear Mr. Tyler,

NPDES Permit AR0021466
Routine Compliance Inspection

In response to the November 16, 2007 routine compliance inspection I offer the following response to the listed violations.

1. Aeration blowers: The aeration contractor is in the process of preparing replacement blowers for all 19 aeration trains. The aerators will be 2-stage blowers that are more appropriately sized for the load. This should eliminate the overload problems that have created the existing failures. The contractor expects the blowers to be ready for delivery and installation by mid January.
2. Ammonia nitrogen: The inadequate supply of oxygen, due to blower failures, is the most likely cause of the exceedances. However, when the current construction of the WWTW is complete, the added detention time should also have a positive impact on the reported ammonia nitrogen. If the proposed changes prove to be inadequate, we will investigate the installation of a fixed film media to improve colony growth.

Please accept my apologies for our failure to satisfy compliance during this period.

Thank you for your understanding. If you have any questions, please contact me at your convenience.

Yours sincerely,

A handwritten signature in cursive that reads 'Mark Yardley'.

Mark Yardley
Public Works Director

cc: File, Mayor, Operations Supervisor