

April 18, 2008

Honorable Marion Gill, Mayor City of Dumas P.O. Box 157 Dumas, Arkansas 71639

RE: Waste Water Treatment Facility

AFIN: 21-00045

NPDES Permit No.: AR0033987

Dear Mayor Gill:

On April 7, 2008, I conducted 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. No documentation of calibration checks conducted on the totalizing flow meter to assure continued compliance. (repeat violation)
- 2. No documentation that the 30-day average percent removal for Biochemical Oxygen Demand or Carbonaceous Biochemical Oxygen Demand is at least eighty-five percent (85%). (repeat violation)
- 3. Inadequate documentation of analytical data, chain of custody, and Discharge Monitoring Reports for the months of January and February 2008. (repeat violation)

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

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

This response should contain detailed documentation describing the course of action taken to correct the items noted. This corrective action should be completed as soon as possible, and the written response is due by **May 13, 2008**.

Honorable Marion Gill, Mayor City of Dumas April 18, 2008 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 (870) 673-8846.

Sincerely,

Steven L. Houderson

Steven L. Henderson District 6 Inspector Water Division

cc: Water Division Enforcement Branch Water Division Permits Branch

€EPA									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       1     N     2     5     3     A     R     0     0     3     3     9     8     7     11     12     0     8     0     4     0     7									Insj 18	c   Inspector   Fac. Type     Image: S   19   S   20							
A         F         I         N         2         1         -         0         0         0         4         5							A N 73 74 75	]	Reserved 80								
					•	_			Sec	tion	B: Fa	cility	v D	Data			
incli <b>City</b>	ne and Location of Facility Inspected ude POTW name and NPDES permit of Dumas WWTP	numi	ber)		al use	ers di	ischa	rgin	g to l	POT	W, als	0		Entry Time/Date 9:00 a.m. 4/7/08		Permit Effective Date <i>November 1, 2006</i>	
Sect	roximately ¼ mile North of Highwa ion 25, Township 9 South, Range 4 ha County, Arkansas													Exit Time/Date 11:50 a.m. 4/7/08	Permit Expiration Date October 31, 2011		
	ne(s) of On-Site Representative(s)/Ti rick Fitzgerald, Operator (870				nd Fa 870) .											Other Facility Data Discharge Location:	
Mar City P.O	Name, Address of Responsible Official/Title/Phone and Fax Number Marion Gill, Mayor						33 53' 33" 91 27' 42"										
				(S =	= Sati:									ring Inspection factory, N = Not Evaluated)			
S	Permit	U	F	low 1	Meas	uren	ıent				S	OI	pei	rations & Maintenance	S	Sampling	
U	<b>Records/Reports</b>	U	S	elf-N	Ionito	oring	g Pro	grai	m		S	Sh	lud		N	Pollution Prevention	
S S	Facility Site Review	N N	1	-	lianc		nedu	les			N N				N N	Multimedia	
5	Effluent/Receiving Waters				atory Sum	·	y of	Find	lings	/Coi				m Water hch additional sheets if necessary)		Other:	
Th	<ul> <li>The following violations were noted during inspection:</li> <li>1. No documentation of calibration checks conducted on the totalizing flow meter to assure continued compliance. (repeat violation)</li> <li>2. No documentation that the 30-day average percent removal for Biochemical Oxygen Demand or Carbonaceous Biochemical Oxygen Demand is at least eighty-five percent (85%). (repeat violation)</li> <li>3. Inadequate documentation of analytical data, chain of custody, and Discharge Monitoring Reports for the months of January and February 2008. (repeat violation)</li> </ul>																
	Name(s) and Signature(s) of Inspector(s)       Agency/Office/Telephon         ADEQ/ Stuttgart/ 870-0										Date April 9, 2008						
Sig	Agency/Office/Phone and Fax Numbers     Date																

AFIN: 21-00045

SECTION A: PERMIT VERIFICATION	
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS	🗹 S 🗆 M 🗇 U 🗆 NA 🗇 NE
DETAILS:	
1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE:	
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES:	
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT:	
4. ALL DISCHARGES ARE PERMITTED:	
SECTION B: RECORDKEEPING AND REPORTING EVALUATION	
RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT	□s □m ∅u □na □ne
DETAILS: Inadequate documentation of analytical data, chain of custody, and Discharge Monitorin January and February 2008. (repeat violation)	g Reports for the months of
1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS:	DY DN DNA ØNE
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE:	OS OM OU ONA ØNE
a. DATES AND TIME(S) OF SAMPLING:	
b. EXACT LOCATION(S) OF SAMPLING:	
c. NAME OF INDIVIDUAL PERFORMING SAMPLING:	
d. ANALYTICAL METHODS AND TECHNIQUES:	DY DN DNA ØNE
e. RESULTS OF CALIBRATIONS:	DY DN DNA ØNE
f. RESULTS OF ANALYSES:	
g. DATES AND TIMES OF ANALYSES:	
h. NAME OF PERSON(S) PERFORMING ANALYSES:	
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE:	OS OM OU ONA ØNE
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR:	Øs 🗆m 🗇u 🖾na 🖾ne
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA:	
SECTION C: OPERATIONS AND MAINTENANCE	
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED	🗹 S 🗆 M 🗇 U 🗆 NA 🗇 NE
DETAILS:	
1. TREATMENT UNITS PROPERLY OPERATED:	Øs 🗆m 🗇u 🖾na 🖾ne
2. TREATMENT UNITS PROPERLY MAINTAINED:	ØS 🗆 🖾 🗆 U 🗆 NA 🗆 NE
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED:	ØS 🗆 🖾 🗆 V 🗆 NA 🗆 NE
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE:	Øs 🗆m 🗇u 🖾na 🗇ne
5. ALL NEEDED TREATMENT UNITS IN SERVICE:	Øs 🗆m 🗇u 🗇na 🗇ne
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED:	Øs 🗆m 🗇u 🗇na 🗇ne
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED:	ØS 🗆 🖾 🗆 U 🗆 NA 🗆 NE
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE:	
9. STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED:	
10. PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED:	
11. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR:	
12. IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED:	
13. HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS:	
14. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT:	
15. IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT:	

SECTION D: SAMPLING	
PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS	S 🛛 🗹 S 🗆 M 🗇 U 🗆 NA 🖾 NE
DETAILS:	
1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT:	
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES:	
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT:	∅y ⊡n ⊡na ⊡ne
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT	
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT:	
6. SAMPLE COLLECTION PROCEDURES ADEQUATE:	
a. SAMPLES REFRIGERATED DURING COMPOSITING:	
b. PROPER PRESERVATION TECHNIQUES USED:	
c. CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136:	
7. IF MONITORING IS PERFORMED MORE OFTEN THAN REQUIRED ARE RESULTS RE	EPORTED ON THE DMR: DY DN DNA DNE
SECTION E: FLOW MEASUREMENT	
PERMITTEE FLOW MEASUREMENT MEETS PERMIT REC	QUIREMENTS DIS DIM DU DINA DINE
DETAILS: No documentation of calibration checks conducted on the t (repeat violation)	otalizing flow meter to assure continued compliance.
1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED	D: TYPE OF DEVICE: 9" Parshall Flume VY IN INA INE
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED:	
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPER	ATED AND MAINTAINED:
4. CALIBRATION FREQUENCY ADEQUATE:	Øy 🗆 n 🗆 na 🗆 ne
5. RECORDS MAINTAINED OF CALIBRATION PROCEDURES:	Dy Øn Ona One
6. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE:	
7. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE	OF TURBULENCE: DY DN DNA DNE
8. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE O	F FLOW RATES: ØY IN INA INE
9. HEAD MEASURED AT PROPER LOCATION:	
SECTION F: LABORATORY	
PERMITTEE LABORATORY PROCEDURES MEET PERMI	T REQUIREMENTS <b>IS IN IU INA M</b>
DETAILS: No analytical data available for review.	
1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 50	03.8(B) FOR SLUDGES) : □Y □N □NA ☑NE
2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS	S BEEN OBTAINED: DY DN DNA DNE
3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIP	MENT: DY DN DNA ØNE
4. QUALITY CONTROL PROCEDURES ADEQUATE:	
5. DUPLICATE SAMPLES ARE ANALYZED <a>&gt;10%</a> OF THE TIME:	
6. SPIKED SAMPLES ARE ANALYZED $\geq$ 10% OF THE TIME:	
7. COMMERCIAL LABORATORY USED:	
a. LAB NAME: McClelland Consulting Engineers	Arkansas Analytical, Inc.
b. LAB ADDRESS: 900 West Markham, Little Rock, Arkansas 72201	11701 I-30, Bldg. 1, Suite 115, Little Rock Arkansas
c. PARAMETERS PERFORMED: CBOD, BOD, TSS, NH3-N, DO, pH	Chronic Bio-monitoring
8. BIOMONITORING PROCEDURES ADEQUATE:	
a. PROPER ORGANISMS USED:	
b. PROPER DILUTION SERIES FOLLOWED:	
c. PROPER TEST METHODS AND DURATION:	
d. RETESTS AND/OR TRE PERFORMED AS REQUIRED:	

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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	S COLOR OTHER							
001	None	None	None	None	None	Clear							
SECTION H: SLUDGE DISPOSAL													
SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS													
DETAILS:					·								
1. SLUDGE M	ANAGEMENT ADEQU	ATE TO MAINTAIN EF	FLUENT QUALITY:			₽s							
2. SLUDGE R	ECORDS MAINTAINED	D AS REQUIRED BY 40	) CFR 503:			□s	🗆 m 🗇 u 🖉 na 🗇 ne						
3. FOR LAND	APPLIED SLUDGE, TY	PE OF LAND APPLIE	D TO: (E.G., FOREST,	AGRICULTURAL, PUE	BLIC CONTACT SITE):								
SECTION	I: SAMPLIN	G INSPECTIO	ON PROCEDU	JRES									
SAMPLE R	ESULTS WITH	IN PERMIT R	EQUIREMENT	S		□s □m	□u □na Øne						
DETAILS:					· · · · · ·								
1. SAMPLES	OBTAINED THIS INSPI	ECTION:					Dy On Ona Øne						
2. TYPE OF S	AMPLE: GRAB:		IETHOD: FREQUE	NCY:									
3. SAMPLES	PRESERVED:						□y □n □na Øne						
4. FLOW PRC	PORTIONED SAMPLE	S OBTAINED:					Dy On Ona Øne						
5. SAMPLE O	BTAINED FROM FACIL	LITY'S SAMPLING DEV	/ICE:				Dy On Ona Øne						
6. SAMPLE R	EPRESENTATIVE OF	VOLUME AND NATUR	E OF DISCHARGE:				□y □n □na Øne						
7. SAMPLE SI	PLIT WITH PERMITTEI	E:					□y □n □na Øne						
8. CHAIN-OF-	CUSTODY PROCEDU	RES EMPLOYED:					□y □n □na Øne						
9. SAMPLES	COLLECTED IN ACCO	RDANCE WITH PERM	IT:				□y □n □na Øne						
SECTION	J: STORM W	VATER POLL	UTION PREV	<b>/ENTION PLA</b>	AN								
STORM W	ATER MANAG	EMENT MEET	S PERMIT RE	QUIREMENTS		□s □m	□u □na Øne						
DETAILS:													
1. SWPPP UP	DATED AS NEEDED:	DATE OF LAST UP	DATE:										
2. SITE MAP I	NCLUDING ALL DISCH	HARGES AND SURFAC	CE WATERS:										
3. POLLUTION	N PREVENTION TEAM	IDENTIFIED:					DY DN DNA ØNE						
4. POLLUTION	4. POLLUTION PREVENTION TEAM PROPERLY TRAINED:												
5. LIST OF PC	5. LIST OF POTENTIAL POLLUTANT SOURCES:												
6. LIST OF PC	DTENTIAL SOURCES A	AND PAST SPILLS AND	D LEAKS:				□y □n □na Øne						
7. ALL NON-S	TORM WATER DISCH	ARGES ARE AUTHOR	IZED:				□y □n □na Øne						
8. LIST OF ST	8. LIST OF STRUCTURAL BMPS:												
9. LIST OF NO	ON-STRUCTURAL BMF	PS:					□y □n □na Øne						
10. BMPS PRO	PERLY OPERATED AI	ND MAINTAINED:					□y □n □na Øne						
11. INSPECTIC	NS CONDUCTED AS	REQUIRED:					□y □n □na Øne						

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FLOW CALCULATION SHEET									
	1								
Date: Ap	ril 7, 2008	Time: <b>11:00 a.m.</b>							
Head in Inc	hes: 91/2	Feet: <b>.791</b>							
		<u> </u>							
Type & Size	Type & Size of Primary Flow Measurement Device: 9" Parshall Flume								
Name & Mo	del of Secondary	/ Flow Measurement D	evice: BFI Strip	Chart Recorder					
Date of last	Calibration of Se	econdary Flow Device:	9/24/07						
	Calibration of Se	condary now Device.	3/24/07						
Recorded F	low at Date & Tir	me Listed Above: 1.4	38 mgd	(Facility Flow Meter)					
Coloulated	Flow at Data 9 T	imalistad Abaya: 1	202 mad						
		Ime Listed Above:         1.           ISCO Open Channel Flow Mean         1.	383 mgd surement Handbook-5 <sup>th</sup>	Edition)					
% Error =	Recorded Value	e   -   Calculated Value	<sup>∋</sup> X 100 ───						
	Ould								
% Error =	1.438	- 1.383	X 100						
/*		1.383							
	.055	X 400							
% Error =	1.383	X 100							
	020	V 100							
% Error =	.039	X 100							
% Error =	3.9	%							
Comments									

ADEQ Water NPDES	Inspection

## **DMR Calculation Check**

* Due to a lack o	f availa	ble record	ds, a DMR o	calculation	check could	not be cond	ucted.
<b>Reporting Period:</b>	From			]	Го		
		Year	Month	Day	Year	Month	Day
Parameter Checked	:		_				
	]	Loading Mass				itration ithly	
	Mo. A	Avg lbs/	'day	Mo. Avg	mg/l	U U	g mg/l
<b>Reported Value:</b>							
Calculated Value:							
Permit Value:							

If calculated value does not equal reported value, explain:

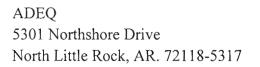
Marion S. Gill Mayor

Johnny Brigham City Clerk

## City of Dumas

P. O. Box 157 155 East Waterman Dumas, AR 71639 Telephone (870)-382-2121 Fax (870) 382-6846 Email address dumas@centurytel.net <u>City Council</u> T. C. Pickett Roy Dalton James Jackson Christopher Hays Aaron White Franklin Healey Diane Fisher Dwayne Snyder

May 12, 2008



Re: AFIN:21-00045

NPDES Permit# AR0033987

Attn: Mr. Steven Henderson Water Division

Dear Mr. Henderson:

This letter is to address the violations mentioned in your letter of April 18, 2008.

Item #1: There will be documented checks of the Flow Meter periodically, as required by the permit.

Item #2: The average percent removal of BOD and cBOD will be calculated by the lab and reported at the end of each month.

Item #3: Data will be kept in bound folders that will be separated by month. This will include test results and the corresponding Chain of Custody. There will also be a copy of the percent removal calculation of the month and the composite sampling data.

Please advise if you have further requirements.



Sincerely,

Marian J. Mill

Marion S. Gill Mayor City of Dumas

Msg,jb