

May 30, 2008

Mary Timmons, Water Utilities Manager City of Mena 701 Mena St. Mena, AR 71953

RE: NPDES Compliance inspection

AFIN: 57-00042 NPDES Permit No.: AR0036692

Dear Ms. Timmons:

On May 29, 2008, 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 violation:

1. Currently the fecal coliform bacteria results are being reported to the nearest tenth. The fecal coliform should be reported in whole numbers only.

Additional items noted:

Sec. C,11 – Overflow reports indicate excessive I & I problems. However; it is noted that continuous efforts are being made to correct these problems. No observed effect of these corrections has been realized yet, based on influent flow measurements.

Sec. F,2 – Facility now uses the USGS method to perform TSS measurements.

- * Facility has hired a contract lab to perform CBOD and NH3-N.
- *No flow meter calibration check was performed due to the meter being calibrated by an outside source one month prior to the inspection.

The above item requires your immediate attention. Please submit a written response to this finding 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 City of Mena May 30, 2008 Page 2

This response should contain detailed documentation describing the course of action taken to correct the item noted. This corrective action should be completed as soon as possible, and the written response is due by June 20, 2008.

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) 389-6970.

Sincerely,

Shan Lynch

District 12 Field Inspector

Shan Synch

Water Division

cc: Water Division Enforcement Branch

Water Division Permits Branch

≎ EPA							Form Approved OMB No. 2040-0003	
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY								
NPDES Compliance Inspection Report								
						ta System Coding		1
Transaction Code							pec. Type Inspector Fac. Type C 19 S 20 1	
Ĺ	A F I N 5	7	- 0 0 0	4 2	Remark	POLK		UNTY
	Inspection Work Days 67 69]	Facility Evaluation R	ating 71	BI N	72 N 73 74 7	1	Reserved
				Section 1	B: Faci	lity Data		
	e and Location of Facility Inspected and POTW name and NPDES permit			harging to POTW	V, also	Entry Time/Date		Permit Effective Date
	•	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	,,,			1039 / 5-27-2008		July 1, 2006
	of Mena WWTP Polk County Rd. 53, north off of I	Iwy 8	3, east of Mena			Exit Time/Date		Permit Expiration Date
						1251 / 5-27-2008		June 30, 2011
	ne(s) of On-Site Representative(s)/Ti e Spencer / Wastewater Plant Sup			aber(s)			Otl	ner Facility Data
Nan	ne, Address of Responsible Official/	Title/	Phone and Fax Numb	per				Major mun.
	ry Timmons / Mena Water Utilities					Contacted		
701	Mena St. na, AR 71953	, 17 14 1	inger ((1/2) e2 r 11	v .		Yes No No		
			Sec	tion C: Areas Ev	aluate	d During Inspection		
~		_	(S = Satisfactor	y, M = Marginal,	П	nsatisfactory, N = Not Evaluated)	1 ~ 1	
S	Permit	S	Flow Measuremen		S	Operations & Maintenance	S	Sampling
M	Records/Reports	S	Self-Monitoring F	O	N	Sludge Handling/Disposal	N	Pollution Prevention
S	Facility Site Review	N S	Compliance Sche	dules	N	Pretreatment	N N	Multimedia
3	Effluent/Receiving Waters		Laboratory ction D: Summary	of Findings/Com		Storm Water (Attach additional sheets if necess		Other:
Sec	. B,1 – Currently the fecal coliforn					rest tenth. The fecal coliform show		eported in whole numbers only.
Additional items noted: Sec. C,11 – Overflow reports indicate excessive I & I problems. However; it is noted that continuous efforts are being made to correct these problems. No observed effect of these corrections has been realized yet, based on influent flow measurements. Sec. F,2 – Facility now uses the USGS method to perform TSS measurements. * Facility has hired a contract lab to perform CBOD and NH3-N. *No flow meter calibration check was performed due to the meter being calibrated by an outside source one month prior to the inspection.								
Name(s) and Signature(s) of Inspector(s) Agency/Office/Telephone					one		Date	
Shar Court								
Shan Lynch				AR Dept. of Environmental Quality-/ Dist. 12 / (870) 389-6970			May 30, 2008	
Signature of Reviewer				Agency/Office/Phone and Fax Numbers			Date	

ADEQ Water NPDES Inspection	AFIN: 57-00042	Permit #: AR0036692

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

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SECTION D: SAMPLING						
		G MEETS PERMIT REQUIREME	NTS	☑S □M □U □NA □NE		
	TAILS:					
1.	SAMPLES TAKEN AT SITE(S)	SPECIFIED IN PERMIT:		☑Y □N □NA □NE		
2.	LOCATIONS ADEQUATE FOR	⊠y □n □na □ne				
3.	FLOW PROPORTIONED SAMI	PLES OBTAINED WHEN REQUIRED BY PERMIT:		Øy □n □na □ne		
4.	SAMPLING AND ANALYSES C	COMPLETED ON PARAMETERS SPECIFIED IN PE	RMIT:	☑Y □N □NA □NE		
5.	SAMPLING AND ANALYSES P	PERFORMED AT FREQUENCY SPECIFIED IN PER	RMIT:	☑Y □N □NA □NE		
6.	SAMPLE COLLECTION PROC	EDURES ADEQUATE:		☑Y □N □NA □NE		
а	. SAMPLES REFRIGERATED D	URING COMPOSITING:		☑Y □N □NA □NE		
b	. PROPER PRESERVATION TE	CHNIQUES USED:		Øy □n □na □ne		
С	. CONTAINERS AND SAMPLE F	HOLDING TIMES CONFORM TO 40 CFR 136:		☑Y □N □NA □NE		
7.	IF MONITORING IS PERFORM	MED MORE OFTEN THAN REQUIRED ARE RESUL	TS REPORTED ON THE DMR:	□Y □N ☑NA □NE		
SI	ECTION E: FLOW	MEASUREMENT				
PE	RMITTEE FLOW ME	ASUREMENT MEETS PERMIT	REQUIREMENTS	☑S □M □U □NA □NE		
DE	ETAILS:					
1.	PRIMARY FLOW MEASUREM	ENT DEVICE PROPERLY INSTALLED AND MAINT	AINED: TYPE OF DEVICE:_weir	Øy □n □na □ne		
2.	FLOW MEASURED AT EACH	OUTFALL AS REQUIRED:		⊠y □n □na □ne		
3.	SECONDARY INSTRUMENTS	(TOTALIZERS, RECORDERS, ETC.) PROPERLY	OPERATED AND MAINTAINED:	Øy □n □na □ne		
4.	CALIBRATION FREQUENCY A	ADEQUATE: <u>4-25-2008</u>		Øy □n □na □ne		
5.	RECORDS MAINTAINED OF C	CALIBRATION PROCEDURES:		⊠y □n □na □ne		
6.	CALIBRATION CHECKS DONE	E TO ASSURE CONTINUED COMPLIANCE:		⊠y □n □na □ne		
7.	FLOW ENTERING DEVICE WE	ELL DISTRIBUTED ACROSS THE CHANNEL AND	FREE OF TURBULENCE:	Øy □n □na □ne		
8.	FLOW MEASUREMENT EQUIP	PMENT ADEQUATE TO HANDLE EXPECTED RAN	IGE OF FLOW RATES:	Øy □n □na □ne		
9.	HEAD MEASURED AT PROPE	ER LOCATION:		Øy □n □na □ne		
SI	ECTION F: LABOR	RATORY				
_		TORY PROCEDURES MEET PE	RMIT REQUIREMENTS	☑S □M □U □NA □NE		
	ETAILS:					
1.	EPA APPROVED ANALYTICAL	L PROCEDURES USED (40 CFR 136.3 FOR LIQUI	DS, 503.8(B) FOR SLUDGES) :	Øy □n □na □ne		
2.	IF ALTERNATIVE ANALYTICA	L PROCEDURES ARE USED, PROPER APPROVA	AL HAS BEEN OBTAINED:	Øy □n □na □ne		
3.	SATISFACTORY CALIBRATIO	N AND MAINTENANCE OF INSTRUMENTS AND E	EQUIPMENT:	Øy □n □na □ne		
4.	QUALITY CONTROL PROCED	URES ADEQUATE:		Øy □n □na □ne		
5.	DUPLICATE SAMPLES ARE A	NALYZED ≥10% OF THE TIME:		Øy □n □na □ne		
6.	SPIKED SAMPLES ARE ANAL	YZED ≥10% OF THE TIME:		Øy □n □na □ne		
7.	COMMERCIAL LABORATORY	USED:		Øy □n □na □ne		
а	ı. LAB NAME:	Data Testing	American Interplex			
b	. LAB ADDRESS:	3434 Country Club; Ft. Smith, AR, 72903	8600 Kanis Rd.; Little Rock, AR 72204			
С	: PARAMETERS PERFORMED:	CBOD, NH3-N	biomonitoring			
8.	BIOMONITORING PROCEDUR	RES ADEQUATE:		☑Y □N □NA □NE		
а	. PROPER ORGANISMS USED:			Øy □n □na □ne		
b	. PROPER DILUTION SERIES F	OLLOWED:		Øy □n □na □ne		
С	. PROPER TEST METHODS AN	ID DURATION:		Øy □n □na □ne		
d	I. RETESTS AND/OR TRE PERF	ORMED AS REQUIRED:		□y Øn □na □ne		

ADEQ Water NPDES Inspection	AFIN: 57-00042	Permit #: AR0036692

SECTION	G: EFFLUE	NT/RECEIVIN	IG WATERS	OBSERVATION	ONS			
SECTION G: EFFLUENT/RECEIVING WATERS OBSERVATIONS BASED ON VISUAL OBSERVATIONS ONLY						□ѕ□м□	IU □NA □NE	
DETAILS:								
OUTFALL #:								
001	none	none	none	none	none	clear	NA	
	l		I					
SECTION	H: SLUDGE	DISPOSAL						
SLUDGE D	DISPOSAL ME	ETS PERMIT F	REQUIREMEN'	TS		□s □м □	IU ØNA □NE	
DETAILS:								
1. SLUDGE M	IANAGEMENT ADEQU	ATE TO MAINTAIN EF	FLUENT QUALITY:			□s□w	I □U ☑NA □NE	
2. SLUDGE R	ECORDS MAINTAINED	O AS REQUIRED BY 40	O CFR 503:			□s □n	I □U ☑NA □NE	
3. FOR LAND	APPLIED SLUDGE, TY	PE OF LAND APPLIE	D TO: (E.G., FOREST	, AGRICULTURAL, PUE	BLIC CONTACT SITE):	NA.		
SECTION	I: SAMPLIN	G INSPECTION	ON PROCED	URES				
SAMPLE F	RESULTS WITH	HIN PERMIT R	EQUIREMENT	S		□s □m □	lu ⊠na □ne	
DETAILS:								
1. SAMPLES	SAMPLES OBTAINED THIS INSPECTION:							
2. TYPE OF S	. TYPE OF SAMPLE: □GRAB:_ □COMPOSITE:_ METHOD:_ FREQUENCY:							
3. SAMPLES	SAMPLES PRESERVED:							
4. FLOW PRO	FLOW PROPORTIONED SAMPLES OBTAINED:							
5. SAMPLE O	. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE:							
6. SAMPLE R	SAMPLE REPRESENTATIVE OF VOLUME AND NATURE OF DISCHARGE:							
7. SAMPLE SPLIT WITH PERMITTEE:							[′] □N ☑NA □NE	
8. CHAIN-OF-	8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED:							
9. SAMPLES	9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT:							
	_							
	J: STORM V							
	ATER MANAG	EMENT MEET	S PERMIT RE	QUIREMENTS			IU ⊠NA □NE	
DETAILS:								
	PDATED AS NEEDED:_						ON MA ONE	
							ON MA ONE	
							ON MA ONE	
4. POLLUTION PREVENTION TEAM PROPERLY TRAINED:							' □N ☑NA □NE ' □N ☑NA □NE	
6. LIST OF POTENTIAL SOURCES AND PAST SPILLS AND LEAKS:							ON MA ONE	
7. ALL NON-STORM WATER DISCHARGES ARE AUTHORIZED:							ON MA ONE	
8. LIST OF STRUCTURAL BMPS:							ON MA ONE	
II. INSPECTIO	DINO COMDUCTED AS	KEMOIKED:				<u> </u>	[′] □n ☑na □ne	

DMR Calculation Check

Reporting Period: From 08 01 01 To 08 01 31

Year Month Day Year Month Day

Parameter Checked: Fecal coliform

	Loading Mass	Concentration Monthly			
	Mo. Avg lbs/day	Mo. Avg mg/l	7-day Avg mg/l		
Reported Value:	NA	3.63	34.1		
Calculated Value:	NA	4	34		
Permit Value:	NA	1000	2000		

If calculated value does not equal reported value, explain:

Currently the fecal coliform bacteria results are being reported to the nearest tenth. The fecal coliform should be reported in whole numbers only.



MENA WATER UTILITIES

701 Mena Street ~Mena, Arkansas ~71953 PH (479) 394-2761 ~ FAX (479) 394-5053

June 30, 2008

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



RE: NPDES Permit #AR0036692

Dear Mr. Lynch:

Thank you for your NPDES Compliance Inspection Report dated May 30, 2008. Please be advised that immediately following your inspection, Mena Water Utilities changed its procedures to comply with your fecal coliform bacteria results reporting requirements. Specifically, we are now reporting our fecal coliform results in whole numbers only. If you require any additional information, please call me at 479-394-2761.

Sincerely,

Manager