



ARKANSAS
Department of Environmental Quality

June 2, 2008

Ms. Belva Plumlee, Wastewater Utility Manager
Bentonville Wastewater Treatment Plant
1901 N.E. A Street
Bentonville, Arkansas 72712

RE: Permit Compliance Inspection

AFIN: 04-00154 NPDES Permit No.: AR0022403

Dear Ms. Plumlee:

On May 15, 2008, I performed a routine permit compliance inspection of the wastewater treatment facility in accordance with the provisions of the Federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, and the regulations promulgated thereunder. This inspection revealed the following violations:

1. Placement of waste in such a manner that it is likely to enter the waters of the State. This is in violation of the Arkansas Water and Air Pollution Control Act 8-4-217,(a)(1) and Part II.B.6 of your permit. This is a repeat violation. Sludge is being improperly stored at the facility (see attached photographs, dated 5/08/08). Solids and liquids/storm water had been allowed to spill over the east and south sides of the sludge storage bed retaining walls. Town Branch is located immediately east of the storage beds and has likely been impacted by this condition during storm events. Effective measures to prevent further overflow from the beds must be implemented immediately.
2. Your discharge permit requires that 6-hour composite treated effluent samples be taken for monitoring of carbonaceous biochemical oxygen demand, total suspended solids, ammonia nitrogen, nitrate + nitrite nitrogen, and total phosphorus. However, review of facility discharge monitoring reports (DMRs) and laboratory records reveals that the wastewater plant has been taking 24-composite samples for these parameters. This is in violation of Part I.A of your permit. Refer to the definition of 6-hour composite sample for sampling requirement details.
3. The name and address of the contract laboratory used for biomonitoring is not included on the DMRs as required by Part II.C.5 of your permit. In addition, the number of permit limit excursions was not listed on any of the DMRs reviewed for this inspection. Refer to the General Instructions on the back of the DMR form for this requirement.

Belva Plumlee, City of Bentonville Wastewater Treatment Plant

June 2, 2008

Page 2

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

Water Division Enforcement Branch
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 June 20, 2008.

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

If I can be of any assistance, please contact me at 479-267-0811, ext. 16.

Sincerely,

A handwritten signature in black ink, appearing to read "John Fazio". The signature is stylized and cursive.

John Fazio
District 1 Field Inspector
Water Division

cc: Water Division Enforcement Branch
Water Division Permits Branch



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

NPDES Compliance Inspection Report

Form Approved
OMB No. 2040-0003

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 2 4 0 3 11 12 0 8 0 5 1 5 17 18 C 19 S 20 1	Remarks																								
<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:10%;">A</td><td style="width:10%;">F</td><td style="width:10%;">I</td><td style="width:10%;">N</td><td style="width:10%;">0</td><td style="width:10%;">4</td><td style="width:10%;">-</td><td style="width:10%;">0</td><td style="width:10%;">0</td><td style="width:10%;">1</td><td style="width:10%;">5</td><td style="width:10%;">4</td><td style="width:10%;"></td><td style="width:10%;"></td><td style="width:10%;"></td><td style="width:10%;"></td><td style="width:10%;"></td><td style="width:10%;"></td><td style="width:10%;"></td><td style="width:10%;"></td> </tr> </table>						A	F	I	N	0	4	-	0	0	1	5	4								
A	F	I	N	0	4	-	0	0	1	5	4														
Inspection Work Days		Facility Evaluation Rating		BI	QA	Reserved																			
67 <input type="text"/> <input type="text"/> <input type="text"/> 69		70 2		71 N	72 N	73 <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> 74 75 <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> 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 Bentonville Wastewater Treatment Plant 1901 N.E. A Street Bentonville, Arkansas 72712	Entry Time/Date 1230 / 05-15-08	Permit Effective Date January 1, 2004
	Exit Time/Date 1540 / 05-15-08	Permit Expiration Date December 31, 2008
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Mike Roberts, Asst. Wastewater Manager, 479-271-3166, 479-271-3167 (fax)	Other Facility Data Outfall 001: 36.39234, -94.20352 Entrance: 36.39100, -94.20383	
Name, Address of Responsible Official/Title/Phone and Fax Number Belva Plumlee, Wastewater Utility Manager City of Bentonville 115 W. Central Bentonville, Arkansas 72712 479-271-3160, 479-271-3163 (fax)	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	S Operations & Maintenance	M Sampling
S Records/Reports	M Self-Monitoring Program	M Sludge Handling/Disposal	N Pollution Prevention
M Facility Site Review	N Compliance Schedules	N Pretreatment	N Multimedia
S Effluent/Receiving Waters	S Laboratory	N Storm Water *	Other:

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

Records obtained during the inspection for later review include DMRs and DMR calculating spreadsheets (monthly reports) for June, July and August of 2007, and the sample collection form and parameter bench sheets for July 2007. Ammonia-nitrogen loading, monthly average and 7-day average limits were exceeded in July, 2007.

Violations noted during this inspection include:

1. Placing waste in such a manner that it is likely to enter the waters of the State.
2. 24-hour composite effluent samples, rather than required 6-hour composite samples, taken for several parameters.
3. Contract lab for biomonitoring not listed on DMR, and number of permit limit excursions not listed on DMRs.

* Storm water issues are to be addressed in a separate inspection.

Name(s) and Signature(s) of Inspector(s) John Fazio	Agency/Office/Telephone/Fax AR Dept. of Environmental Quality-Fayetteville 479-267-0811, ext. 16; 479-267-0819 (fax)	Date May 29, 2008
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: Y N NA NE
 - 2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES: Y N NA NE
 - 3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT: Y N NA NE
 - 4. ALL DISCHARGES ARE PERMITTED: Y N NA NE

SECTION B: RECORDKEEPING AND REPORTING EVALUATION

RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT S M U NA NE

- DETAILS:
- 1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS: Y N NA NE
 - 2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE: S M U NA NE
 - a. DATES AND TIME(S) OF SAMPLING: Y N NA NE
 - b. EXACT LOCATION(S) OF SAMPLING: Y N NA NE
 - c. NAME OF INDIVIDUAL PERFORMING SAMPLING: Y N NA NE
 - d. ANALYTICAL METHODS AND TECHNIQUES: Y N NA NE
 - e. RESULTS OF CALIBRATIONS: Y N NA NE
 - f. RESULTS OF ANALYSES: Y N NA NE
 - g. DATES AND TIMES OF ANALYSES: Y N NA NE
 - h. NAME OF PERSON(S) PERFORMING ANALYSES: Y N NA NE
 - 3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE: S M U NA NE
 - 4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR: S M U NA NE
 - 5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA: Y N NA NE

SECTION C: OPERATIONS AND MAINTENANCE

TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED S M U NA NE

- DETAILS:
- 1. TREATMENT UNITS PROPERLY OPERATED: S M U NA NE
 - 2. TREATMENT UNITS PROPERLY MAINTAINED: S M U NA NE
 - 3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED: City has provided dual feed for power S M U NA NE
 - 4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE: SCADA – battery backup 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: Collection system Y N NA NE
 - 12. IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED: Y N NA NE
 - 13. HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS: Overflows Y N NA NE
 - 14. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT: Y N NA NE
 - 15. IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT: Y N NA NE

SECTION D: SAMPLING

PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS

S M U NA NE

DETAILS:

1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT:	<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: Taking 24-hour composite samples rather than 6-hour composites.	<input type="checkbox"/> Y <input checked="" 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, RESULTS ARE REPORTED ON THE DMR:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input 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: ISCO 3010 Ultrasonic	<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: Calibrated 5/08	<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:	<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: American Interplex Bio-Analytical Lab	
b. LAB ADDRESS: 8600 Kanis Rd., Little Rock, Arkansas 72204 3240 Spurgin Rd., Doyline, LA 71023	
c. PARAMETERS PERFORMED: Table II Organics, Table III Metals, TCLP, PCB Biomonitoring	
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	None	None	None	Clear	Some algae

SECTION H: SLUDGE DISPOSAL

SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS S M U NA NE

DETAILS: * There are solids/liquid overflow problems with storage beds (see letter and photos for details).

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 checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
3. FOR LAND APPLIED SLUDGE, TYPE OF LAND APPLIED TO: (E.G., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE):	<u>Agricultural</u>

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 type="checkbox"/> N <input type="checkbox"/> NA <input checked="" 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 type="checkbox"/> NA <input checked="" type="checkbox"/> NE
4. FLOW PROPORTIONED SAMPLES OBTAINED:	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE
5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE:	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE
6. SAMPLE REPRESENTATIVE OF VOLUME AND NATURE OF DISCHARGE:	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE
7. SAMPLE SPLIT WITH PERMITTEE:	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE
8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED:	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE
9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT:	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE

SECTION J: STORM WATER POLLUTION PREVENTION PLAN

STORM WATER MANAGEMENT MEETS PERMIT REQUIREMENTS S M U NA NE

DETAILS: (Have No Exposure Certification – issues addressed in separate inspection)

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: **May 15, 2008** Time: **1326**

Head in Inches: **15.0** Feet: **1.25**

Type & Size of Primary Flow Measurement Device: **24" Parshall Flume**

Name & Model of Secondary Flow Measurement Device: **ISCO 3010 Ultrasonic**

Date of last Calibration of Secondary Flow Device: **05/08**

Recorded Flow at Date & Time Listed Above: **4840 gpm** (Facility Flow Meter)

Calculated Flow at Date & Time Listed Above: **5073 gpm**
 (Flow is calculated using flow charts in: ISCO Open Channel Flow Measurement Handbook-5th Edition)

% Error =	$\frac{\text{Recorded Value} - \text{Calculated Value}}{\text{Calculated Value}}$	X 100	
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% Error =	$\frac{4840 - 5073}{5073}$	X 100	
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% Error =	$\frac{-233}{5073}$	X 100	
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% Error =	-0.0459	X 100	
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% Error =	-4.59	%	
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Comments: **OK**

Water Division NPDES Photographic Evidence Sheet

Location: Bentonville Wastewater Treatment Plant

Photographer: John Fazio **Witness:** None

Photo # 1 **Of** 4 **Date:** 5/8/08 **Time:** 1419

Description: Overflow from sludge storage beds. Town Branch immediately to left (east) of fence.



Photographer: John Fazio **Witness:** None

Photo # 2 **Of** 4 **Date:** 5/8/08 **Time:** 1420

Description: Overflow from sludge storage beds (south side). Looking west.



Water Division NPDES Photographic Evidence Sheet							
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Location:	Bentonville Wastewater Treatment Plant						
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Photographer:	John Fazio	Witness:	None			
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Photo #	3	Of	4	Date:	5/8/08	Time:	1420
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Description:	Overflow of solids on south side of sludge storage beds. Looking north.						
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Photographer:	John Fazio	Witness:	None			
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Photo #	4	Of	4	Date:	5/8/08	Time:	1421
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Description:	Overflowing sludge beds. Looking east. Town Branch immediately beyond fence in background.						
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WASTEWATER DEPARTMENT
June 24, 2008



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

RE: Written response to items noted during NPDES permit compliance inspection conducted on May 15, 2008 by Mr. John Fazio

NPDES Permit No.: AR0022403 AFIN: 04-00154

RESPONSE:

- The sludge that had spilled over the south and east walls of the sludge storage bed retaining walls has been recovered. (See attached photographs).
A buffer zone between the stored sludge and the sludge storage bed retaining walls has been created and will be maintained to prevent future spillage. (See attached photographs).
Improvements to the sludge storage beds are scheduled to take place this year. The necessary funds have been approved and construction plans have been created by our consulting engineers, USI Consulting Engineers of Springdale, Arkansas. Attached you will find a letter from USI Consulting Engineers dated May 15, 2008, addressed to Mr. John Bailey of ADEQ. The purpose of the letter was to inquire whether a construction permit would be required from ADEQ before proceeding with the proposed sludge storage facility improvements.
- Part II, Section C, Item 6 of our NPDES permit states monitoring more frequently than required by the permit is acceptable as long as the increased frequency is indicated on the DMR. 24-hour composite sampling rather than 6-hour composite sampling for specific parameters is noted on the DMRs submitted.
An application for the renewal of our NPDES permit has been submitted to ADEQ. In the application, it has been requested to change the 6-hour composite sampling requirements to 24-hour composite sampling.
- The name and address of the contract laboratory used for biomonitoring and the number of excursions shall be included on future DMRs.

Sincerely,

Belva Plumlee
Wastewater Utilities Manager
City of Bentonville
1901 N.E. "A" Street
Bentonville, AR 72712
Office: (479)271-3160 Fax: (479)271-3163

CITY OF BENTONVILLE

Wastewater Department

June 24, 2008



Figure # 1: Looking south on the east side of the sludge storage bed



Figure # 2: Looking west on the south side of the sludge storage beds

May 15, 2008

Terry W. Carpenter, P.E.
Vice President
4847 Kaylee Avenue-Suite B
Springdale, Arkansas 72762
479.872.7115 Telephone
479.872.7118 Facsimile
twcarpenter@usi-ce.com

Mr. John Bailey, P.E., Permits Branch Manager
Arkansas Department of Environmental Quality
8001 National Drive
P.O. Box 8913
Little Rock, Arkansas 72219

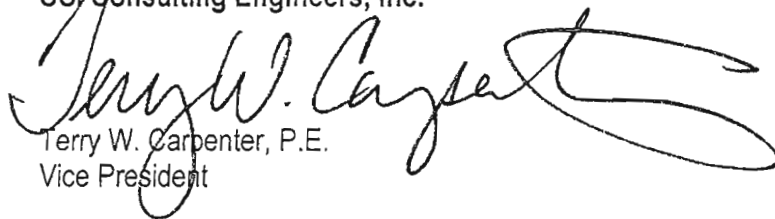
Re: Sludge Storage Facility—Bentonville WWTP Improvements
Bentonville, Arkansas
USI Project No. 0709022

Dear Mr. Bailey:

We are writing on behalf of the City of Bentonville to advise you of their desire to make modifications to their existing sludge storage facility. The City wastewater staff is currently using an existing sludge drying bed to store dewatered sludge until they can transport it to their composting facility for further processing. They are also using the existing sludge drying beds to empty contents from their vacuum trucks. The proposed improvements will extend the exterior walls of the sludge drying beds up two feet to prevent any stored sludge from spilling out of the containment area onto the adjacent area.

We were uncertain whether a construction permit would be required since no change in the process is being modified from the purpose it is already being used. If you have any questions or need additional information, please do not hesitate to contact us.

Sincerely,
USI Consulting Engineers, Inc.



Terry W. Carpenter, P.E.
Vice President

Cc: Belva Plumlee, WWTP Manager
Mike Roberts, Asst. WWTP Manager