

June 12, 2008

Mr. Rick Elumbaugh, Mayor City of Batesville 500 East Main Street Batesville, AR 72501

RE: Compliance Inspection

AFIN: 32-00044 NPDES Permit No.: AR0020702

Dear Mr. Elumbaugh:

On June 5, 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 violations:

Records review revealed that the facility exceeded the permit limit for BOD Concentration Monthly Average – mg/l and Loading Mass Monthly Average – lbs/day. The permit limit for Concentration Monthly Average – mg/l is 30 mg/l. The facility reported 33 mg/l. The permit limit for Loading Mass Monthly Average – lbs/day is 1,101 lbs/day. The facility reported 1,900 lbs/day. The facility also exceeded TSS Loading Mass Month Average – lbs/day. The permit limit for Loading Mass Monthly Average – lbs/day is 1468 lbs/day. The facility reported 1,659 lbs/day. These items are in violation of Part I, Section A, Final Effluent Limitations and Monitoring Requirements, of the permit.

The facility reported these non-compliance items to the Department. No further action is required, at this time.

If I can be of any assistance you may contact me at 870-793-5819.

Sincerely,

Mike Kennedy District 11

Mike Kennedy

Water Division

cc: Water Division Enforcement Branch

Water Division Permits Branch

I	S	Permit	S	Flow Measurement	S	Operations & Maintenance	S	Sampling
	S	Records/Reports	S	Self-Monitoring Program	S	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)

Discharge Monitoring Reports were reviewed March, April & May, 2008 during the inspection.

It was noted that First Quarter Bio-monitoring for Fiscal Year 2008 passed.

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The facility also exceeded TSS Loading Mass Month Average – lbs/day. The permit limit for Loading Mass Monthly Average – lbs/day is 1468 lbs/day. The facility reported 1,659 lbs/day.

These items are in violation of Part I, Section A, Final Effluent Limitations and Monitoring Requirements, of the permit.

The facility reported these non-compliance items to the Department.

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Telephone/Fax	Date
Mike Kennedy Mike Kennedy	AR Dept. of Environmental Quality-Batesville 870-793-5819 / Fax 870-793-5814	June 13, 2008
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date

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SECTION A: PERMIT VERIFICATION			
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS	√s Γ	⊒м □υ [	INA □NE
DETAILS:			<u> </u>
CORRECT NAME AND MAILING ADDRESS OF PERMITTEE:		ØY □N	
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES:			ØNA □NE
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT:		Øy □n	
4. ALL DISCHARGES ARE PERMITTED:		⊠Y □N	□NA □NE
SECTION B: RECORDKEEPING AND REPORTING EVALUATION			
RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT	Øs [		NA □NE
DETAILS:			
ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS:		ØY □N	□NA □NE
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE:	₩	Źs □m □u	
a. DATES AND TIME(S) OF SAMPLING:		ØY □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:		ØY □N	□NA □NE
e. RESULTS OF CALIBRATIONS:		ØY □N	
f. RESULTS OF ANALYSES:		Øy □n	□NA □NE
g. DATES AND TIMES OF ANALYSES:		Øy □n	
h. NAME OF PERSON(S) PERFORMING ANALYSES:		Øy □n	
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE:	₹	Źs □m □u	
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR:	₹	Źs □m □u	
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA:		⊠Y □N	
SECTION C: OPERATIONS AND MAINTENANCE			
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED	<b>⊻</b> S L		JNA ∐NE
DETAILS:			
1. TREATMENT UNITS PROPERLY OPERATED:		Zs □M □U	
2. TREATMENT UNITS PROPERLY MAINTAINED:		Zs □m □u	
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED:_(Portable Generators & Pond System)	<u> </u>	Źs □m □u	
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE: (Alarms on Blowers & Chlorine System)	· •	Źs □m □u	
5. ALL NEEDED TREATMENT UNITS IN SERVICE: (Bar screen & Grit Units on standby) (Sand Filters in operation)		Zs □m □u	
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED:_(3-Class IV, 5-Class III, 1-Class II)	<u> </u>	Źs □m □u	
4. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED:	<u> </u>	ĭs □m □u	
5. OPERATION AND MAINTENANCE MANUAL AVAILABLE:		ØY □N	
6. STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED:			
7. PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED:			□NA □NE
8. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR: 100 year	flood		□NA □NE
9. IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED:			□NA □NE
10. HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS:			□NA □NE
11. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT: Due to 100 year flood waters			
12. IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT:		⊠Y □N	

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SECTION D: SAMPLING	
PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS	☑S □M □U □NA □NE
DETAILS:	
SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT:	Øy □n □na □ne
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES:	☑Y □N □NA □NE
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT:	☑y □n □na □ne
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT:	☑Y □N □NA □NE
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT:	Øy □n □na □ne
6. SAMPLE COLLECTION PROCEDURES ADEQUATE:	☑Y □N □NA □NE
a. SAMPLES REFRIGERATED DURING COMPOSITING:	Øy □n □na □ne
b. PROPER PRESERVATION TECHNIQUES USED:	☑y □n □na □ne
c. CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136:	☑Y □N □NA □NE
7. IF MONITORING IS PERFORMED MORE OFTEN THAN REQUIRED ARE RESULTS REPORTED ON THE DMR:	□y □n ☑na □ne
SECTION E: FLOW MEASUREMENT	
PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS	☑S □M □U □NA □NE
DETAILS: Secondary measurement device out of calibration	
PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: TYPE OF DEVICE:     001 – 24 Inch Parshall Flume	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:	☑y □n □na □ne
4. CALIBRATION FREQUENCY ADEQUATE: (1-16-08) (Also performed monthly in house)	☑Y □N □NA □NE
5. RECORDS MAINTAINED OF CALIBRATION PROCEDURES:	☑Y □N □NA □NE
6. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE:	☑Y □N □NA □NE
7. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE:	☑Y □N □NA □NE
8. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES:	☑y □n □na □ne
9. HEAD MEASURED AT PROPER LOCATION:	☑Y □N □NA □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):	Øy □n □na □ne
2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED: (For TSS)	☑Y □N □NA □NE
3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT:	☑y □n □na □ne
4. QUALITY CONTROL PROCEDURES ADEQUATE:	☑Y □N □NA □NE
5. DUPLICATE SAMPLES ARE ANALYZED ≥10% OF THE TIME:	☑Y □N □NA □NE
6. SPIKED SAMPLES ARE ANALYZED ≥10% OF THE TIME:	☑Y □N □NA □NE
7. COMMERCIAL LABORATORY USED:_(State Certified)	☑Y □N □NA □NE
a. LAB NAME: <u>American Interplex</u>	
b. LAB ADDRESS: 8600 Kanis Road, Little Rock, AR 72204-2322	
c. PARAMETERS PERFORMED: Biomontiroing	
8. BIOMONITORING PROCEDURES ADEQUATE:	☑Y □N □NA □NE
a. PROPER ORGANISMS USED:	Øy □n □na □ne
b. PROPER DILUTION SERIES FOLLOWED:	Øy □n □na □ne
c. PROPER TEST METHODS AND DURATION:	☑Y □N □NA □NE
d. RETESTS AND/OR TRE PERFORMED AS REQUIRED:	□y □n ☑na □ne

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SECTION	G: EFFLUEI	NT/RECEIVIN	IG WATERS	OBSERVATION	ONS		
	N VISUAL OBS			0_0		⊠s □m □	U DNA DNE
	Observed 6-5-0		· · · · · · · · · · · · · · · · · · ·		L		
OUTFALL #:	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	COLOR	OTHER
001	None	None	Minor	Trace	None	Light Green	-
SECTION	H: SLUDGE	DISPOSAL					
	DISPOSAL ME		REQUIREMEN	TS		☑s □m □	U DNA DNE
	(No Biosolids were				l .		
	IANAGEMENT ADEQU			,		Øs □m	□U □NA □NE
2. SLUDGE R	ECORDS MAINTAINED	AS REQUIRED BY 40	) CFR 503:			□s □м	□u Øna Øne
3. FOR LAND	APPLIED SLUDGE, TY	PE OF LAND APPLIE	O TO: Agricultural (E	E.G., FOREST, AGRICU	ULTURAL, PUBLIC CONT	ACT SITE):	
SECTION	I: SAMPLIN	G INSPECTION	N PROCEDI	URES			
SAMPLE F	RESULTS WITH	IIN PERMIT R	EQUIREMENT	S		□s □m □	U ⊠NA □NE
DETAILS:					·		
1. SAMPLES	OBTAINED THIS INSPE	ECTION:				□Y	☑N □NA □NE
2. TYPE OF S	SAMPLE: GRAB:	COMPOSITE:_ N	METHOD: FREQUE	ENCY:			
3. SAMPLES	PRESERVED:					□Y	□n ☑na □ne
4. FLOW PRO	PORTIONED SAMPLE	S OBTAINED:				□Y	□N ☑NA □NE
5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE:						□Y	□n ☑na □ne
6. SAMPLE R	EPRESENTATIVE OF \	VOLUME AND NATUR	E OF DISCHARGE:			□Y	□N ☑NA □NE
7. SAMPLE S	PLIT WITH PERMITTE	E:				□Y	□N ☑NA □NE
8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED:							□N ☑NA □NE
9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT:					□Y	□N ☑NA □NE	
	J: STORM V						
STORM W	ATER MANAG	EMENT MEET	S PERMIT RE	QUIREMENTS	5	□s □m □	U □NA ☑NE
DETAILS:	The facility has	s a no exposure	e certification e	exclusion		1	
1. SWPPP UF	PDATED AS NEEDED:_	_ DATE OF LAST UP	DATE:				□N □NA ☑NE
2. SITE MAP	INCLUDING ALL DISCH	HARGES AND SURFAC	CE WATERS:				□N □NA ☑NE
3. POLLUTIO	N PREVENTION TEAM	IDENTIFIED:					□N □NA ☑NE
4. POLLUTIO	N PREVENTION TEAM	PROPERLY TRAINED	):			-	□N □NA ☑NE
5. LIST OF PO	OTENTIAL POLLUTANT	Γ SOURCES:					□N □NA ☑NE
6. LIST OF PO	OTENTIAL SOURCES A	AND PAST SPILLS ANI	D LEAKS:				□N □NA ☑NE
7. ALL NON-S	STORM WATER DISCH	ARGES ARE AUTHOR	IIZED:				□N □NA ☑NE
	FRUCTURAL BMPS:						□N □NA ☑NE
	ON-STRUCTURAL BMF					-	□N □NA ☑NE
	PERLY OPERATED AN						□N □NA ☑NE
11. INSPECTIO	ONS CONDUCTED AS I	REQUIRED:				□Y	□N □NA ☑NE

	FLOW CALCULATION SHEET								
Doto: 6	F 00		ima	1212					
Date: 6-	5-08		ime:	1313					
Head in Inc	Head in Inches: 7.12 Feet: 0.0593								
		L	ļ						
Type & Size	e of Pri	mary Flow I	Measurem	ent Device:	24 Inch Pa	arshall Flume			
Name & Mod	el of Sed	condary Flow	Measurem	ent Device:	Fis	cher Porter Model 139	)2		
		,							
Date of last	Calibra	ation of Sec	ondary Fl	ow Device: 、	January 16,	2008			
Recorded F	low at	Date & Tim	e Listed A	bove: 2.25	57 MGD	(Facility Flow Met	er)		
Calculated	Flow at	t Date & Tin	na Lietad	Λhove: 2.2	282 MGD				
						<u> </u> 	8)		
		_					,		
% Error =	Reco	rded Value	- Calc	culated Value	X 100				
70 LIIOI –	Calculated Value				X 100				
	1								
% Error =		2.257	-	2.282	X 100	-1.096			
, =			2.282			7.100			
	Ī		1						
% Error =			X 100						
% Error =			X 100						
70 LITOI —			X 100						
% Error =	_1	1.096%	%						
, 5 = . 7 5 .									
Comments:	Gr	eater than	+ 10% eı	ror (OK)					
	1			, /					

## **DMR Calculation Check**

(001)

Reporting Period: From 2008 April 01 To 2008 April 30
Year Month Day Year Month Day

Parameter Checked: BOD

	Loading Mass	Concentration Monthly		
	Mo. Avg lbs/day	Mo. Avg mg/l	7-day Avg mg/l	
Reported Value:	1,900	33	42	
Calculated Value:	1,900	32.8	42	
Permit Value:	1101	30	45	

If calculated value does not equal reported value, explain: The only figure not equal was due to rounding off.

## **DMR Calculation Check**

(001)

Reporting Period: From 2008 May 01 To 2008 May 31

Year Month Day Year Month Day

Parameter Checked: TSS

Loading Concentration **Monthly** Mass Mo. Avg. - lbs/day Mo. Avg. - mg/l 7-day Avg. - mg/l **Reported Value:** 479 **18** 25 **Calculated Value:** 479.2 **17.6** 24.7 **40 60** 1468 **Permit Value:** 

If calculated value does not equal reported value, explain: Difference is due to rounding off.

## Attachment 3:

Records review revealed that the facility exceeded the permit limit for BOD Concentration Monthly Average – mg/l and Loading Mass Monthly Average – lbs/day. The permit limit for Concentration Monthly Average – mg/l is 30 mg/l. The facility reported 33 mg/l. The permit limit for Loading Mass Monthly Average – lbs/day is 1,101 lbs/day. The facility reported 1,900 lbs/day.

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