

October 20, 2008

Mr. David Cruseturner, Assistant Director Arkansas Department of Correction P.O. Box 7807 Pine Bluff, AR 71601

RE: Compliance Inspection

AFIN: 33-00036 NPDES Permit No.: AR0044016

Dear Mr. Cruseturner:

On October 6, 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 that the facility was out of compliance with the permit. Specifically, I found the following violations:

- 1. The facility was in the process of building two more sand bed filters, but no specifications were sent to the Department for review before performing the construction. This is a violation of The Water and Air Pollution Control Act (8-4-217) b, 1, A.
- 2. A review of the DMR's revealed that the facility was not including the name and address of the outside laboratory performing the sampling and /or analyses. This is a violation of Part II, Section C, Item 5, of the permit.
- 3. The facility was not preparing and maintaining on file a certification statement on each batch of land applied Biosolids as required by the permit. This is a violation of Part III, Section A, Item 6, of the permit.

4. The biosolids had not been monitored at the frequency as required by the permit. This is a violation of Part III, Section B, Items 1 & 2, of the permit.

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 David Cruseturner Arkansas Department of Correction (Calico Rock) October 20, 2008 Page 2

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 November 10, 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 870-793-5819.

Sincerely,

Mike Kennedy

Mike Kennedy District 11 Water Division

cc: Water Division Enforcement Branch Water Division Permits Branch

⇔epa									Form Approved OMB No. 2040-0003		
		UNIT	ED STATES ENVIRONMI	ENTAL PROTECTIO	N AGEN	CY					
	NPDES										
NPDES Compliance Inspection Report Section A: National Data System Coding											
Transaction Code NPDES Yr/Mo/Day Inspector Fac. Type											
1	$\mathbf{N} 2 5 3 \mathbf{A} \mathbf{R}$	0	0 4 4 0	1 6 11	12	0	8 1 0 0 6 17	18	$\begin{array}{c c} C \\ \hline C \\ \hline 19 \\ \hline S \\ \hline 20 \\ \hline 2 \\ \hline 2 \\ \hline \end{array}$		
		3	- 0 0 0	3 6	Remark						
	Inspection Work Days 67 69	I	Facility Evaluation R	ating 71	BI N	(72	QA N 73 74 75] 	Reserved 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) Arkansas Department of Corrections Wastewater Treatment Plant							1245 / 10-6-08		November 1, 2005		
Izard County Correction Facility 2.5 miles north of Calico Rock off Highway #5							Exit Time/Date 1500 / 10-6-08		Permit Expiration Date October 31, 2010		
Ca	lico Rock, Arkansas (Izaro	d Co	unty)								
	ne(s) of On-Site Representative(s)/Ti nny Blankenship / Maintena							ner Facility Data 36°09′58.701″			
	ne, Address of Responsible Official/							\mathbf{W}_{2}	92° 09′06.436 ″		
	vid Cruseturner / Assistant			6625			Contacted				
	kansas Department of Corr). Box 8707	ecuo	on				$_{\rm Yes}$ \square $_{\rm No}$				
	ne Bluff, AR 71601										
				tion C: Areas Ev y, M = Marginal,			uring Inspection sfactory, N = Not Evaluated)				
S	Permit	S	Flow Measuremen	nt	S	Op	erations & Maintenance	S	Sampling		
S	Records/Reports	S	Self-Monitoring P	Program	U	Slu	dge Handling/Disposal	Ν	N Pollution Prevention		
S	Facility Site Review	U	Compliance Schee	dules	Ν	Pre	treatment	Ν	N Multimedia		
S	Effluent/Receiving Waters	S	Laboratory		Ν		rm Water	Other:			
D	MR's were reviewed for the						ach additional sheets if necessar	y)			
1. '	The facility was in the process of buc construction. This is a violation of	uildin	g two more sand be	ed filters, but no	specifi	icati		for re	eview before performing the		
2.	A review of the DMR's revealed the This is a violation of Part II, Section	at the	facility was not inc	luding the name	· ·		, ,	ormir	ng the sampling and /or analyses.		
3. '	The facility was not preparing and	main	taining on file a cer		nent on	eac	h batch of land applied Biosolids	as re	quired by the permit. This is a		
	violation of Part III, Section A, Iter The biosolids had not been monitor			equired by the p	ermit.	Thi	s is a violation of Part III, Section	n B, I	tems 1 & 2, of the permit.		
	ne(s) and Signature(s) of Inspector(s)		Agency/Office/			Fax tal Quality-Batesville		Date October 20, 2008		
1	like Kennedy.	meal	*7	870-793-5819 /					000001 20, 2000		
-	U Mike Ke	enneo	y								
Sig	nature of Reviewer		Agency/Office/Phone and Fax Numbers					Date			

Permit #: AR0044016

SECTION A: PERMIT VERIFICATION	
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS	
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:	Øy 🛛 n 🗆 na 🗆 ne
4. ALL DISCHARGES ARE PERMITTED:	Øy 🗆n 🗆na 🗇ne
SECTION B: RECORDKEEPING AND REPORTING EVALUATION	
RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT	
DETAILS:	·
1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS:	Øy 🛛 n 🗆 na 🗆 ne
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE:	Øs 🗆m 🗇u 🖾na 🗇ne
a. DATES AND TIME(S) OF SAMPLING:	
b. EXACT LOCATION(S) OF SAMPLING:	
c. NAME OF INDIVIDUAL PERFORMING SAMPLING:	
d. ANALYTICAL METHODS AND TECHNIQUES:	Øy On Ona One
e. RESULTS OF CALIBRATIONS:	Øy 🛛 n 🗆 na 🗆 ne
f. RESULTS OF ANALYSES:	
g. DATES AND TIMES OF ANALYSES:	Øy 🛛 n 🗆 na 🗆 ne
h. NAME OF PERSON(S) PERFORMING ANALYSES:	
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE:	Øs 🗆m 🗇u 🗇na 🗇ne
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR:	OS OM OU ONA ØNE
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA:	Øy 🛛 n 🖾 na 🖾 ne
SECTION C: OPERATIONS AND MAINTENANCE	
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED	
DETAILS:	
1. TREATMENT UNITS PROPERLY OPERATED:	Øs 🗆m 🗇u 🗇na 🗇ne
2. TREATMENT UNITS PROPERLY MAINTAINED:	
STANDBY POWER OR OTHER EQUIVALENT PROVIDED: (Generator)	
ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE: (High Level Alarms at Lift Stations)	
3. ALL NEEDED TREATMENT UNITS IN SERVICE:	
ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED: (1-Class I)	
 SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED: (Inventory, but no complete list of parts) (Most parts delivered within 24 hrs.) 	
6. OPERATION AND MAINTENANCE MANUAL AVAILABLE:	
7. STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED:	
8. PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED:	
9. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR:	Øy 🛛 n 🗆 na 🖾 ne
10. IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED:	Øy 🛛 n 🗆 na 🖾 ne
11. HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS:	
 HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS: HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT: 	Øy 🛛 n 🗆 na 🗆 ne
	Øy On Ona One Øy On Ona One

Permit #: AR0044016

SECTION D: SAMPLING	
PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS	ØS OM OU ONA ONE
DETAILS:	
1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT:	⊠y ⊡n ⊡na ⊡ne
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES:	🗹 Y 🗆 N 🗆 NA 🗆 NE
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT:	Dy On Øna One
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:	Dy Dn Øna Dne
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 REPORTED ON THE DMR:	DY DN ØNA DNE
SECTION E: FLOW MEASUREMENT	
PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS	
DETAILS:	·
PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: TYPE OF DEVICE: (60 degree V-Notch Weir)	Øy 🛛 n 🗆 na 🖾 ne
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED:	Øy 🛛 n 🖓 na 🖓 ne
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED:	
4. CALIBRATION FREQUENCY ADEQUATE:	
5. RECORDS MAINTAINED OF CALIBRATION PROCEDURES: (Last calibration 9-08)	
6. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE:	
7. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE:	
8. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES:	
9. HEAD MEASURED AT PROPER LOCATION:	
SECTION F: LABORATORY	
PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS	
DETAILS:	
1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(B) FOR SLUDGES) :	
2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED:	DY DN ØNA DNE
3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT:	Øy 🛛 n 🖓 na 🖓 ne
4. QUALITY CONTROL PROCEDURES ADEQUATE:	
5. DUPLICATE SAMPLES ARE ANALYZED ≥10% OF THE TIME:	
6. SPIKED SAMPLES ARE ANALYZED >10% OF THE TIME:	Øy 🛛 n 🖓 na 🖓 ne
7. COMMERCIAL LABORATORY USED: (Yes)	Øy 🛛 n 🖓 na 🖓 ne
a. LAB NAME: McClelland Consulting Engineers, Inc.	
b. LAB ADDRESS: P.O. Box 34087, Little Rock, AR 72203-4087	
c. PARAMETERS PERFORMED: (CBOD5, TSS, Fecal Coliform, NH3-N, Nitrate-Nitrogen, DO, & pH)	
8. BIOMONITORING PROCEDURES ADEQUATE:	Dy Dn Øna Dne
a. PROPER ORGANISMS USED:	Dy Dn Øna Dne
b. PROPER DILUTION SERIES FOLLOWED:	DY DN ØNA DNE
c. PROPER TEST METHODS AND DURATION:	DY DN ØNA DNE
d. RETESTS AND/OR TRE PERFORMED AS REQUIRED:	DY DN ØNA DNE

ADEQ Water NPDES Inspection			
	AI	DEQ Water NP	DES Inspection

Permit #: AR0044016

SECTION G: EFFLUENT/RECEIVING WATERS OBSERVATIONS										
BA	SED ON	VISUAL OBS	ERVATIONS C	NLY			⊠s ⊏		U 🗆 NA 🗆 NE	
DE	TAILS:									
OUT	TFALL #:	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	COLO	OR	OTHER	
	001	None	None	None	None	None	Clea	ar		
						•				
SE	CTION	H: SLUDGE	DISPOSAL							
SLI	UDGE D	SPOSAL ME	ETS PERMIT R	EQUIREMEN	ГS		🗆 s 🗆]W ⊠(
		(Not sampling Bios	solids at frequency	required by 503 rec	gulation) (No certifi	cation statement pre	pared or ma	aintaine	d of land applied	
soli	1	ANAGEMENT ADEQU	ATE TO MAINTAIN EF	FLUENT QUALITY:			R	1́ѕ ⊓м		
2.	SLUDGE R	ECORDS MAINTAINED	D AS REQUIRED BY 40) CFR 503:						
					. AGRICULTURAL. PU	BLIC CONTACT SITE):				
-	3. FOR LAND APPLIED SLUDGE, TYPE OF LAND APPLIED TO: (E.G., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE):									
SF	CTION	I: SAMPI IN	G INSPECTIO		JRES					
			HIN PERMIT R						U 🗹 NA 🗆 NE	
DE	TAILS:									
1.	SAMPLES (OBTAINED THIS INSPI	ECTION:					ΠY	🗹n 🗆na 🗆ne	
2.	TYPE OF S	AMPLE: GRAB:		IETHOD: FREQUE	NCY:					
3.	SAMPLES F	PRESERVED:						ΠY	□n Øna □ne	
4.	FLOW PRO	PORTIONED SAMPLE	S OBTAINED:					ΠY	□n Øna □ne	
5.	SAMPLE O	BTAINED FROM FACIL	LITY'S SAMPLING DEV	ICE:				ΠY	ON ØNA ONE	
6.	SAMPLE R	EPRESENTATIVE OF	VOLUME AND NATUR	E OF DISCHARGE:				ΠY	□n Øna □ne	
7.	SAMPLE SP	PLIT WITH PERMITTEI	E:					ΠY	□n Øna □ne	
8.	CHAIN-OF-	CUSTODY PROCEDU	RES EMPLOYED:					ΠY	□n Øna □ne	
9.	SAMPLES (COLLECTED IN ACCO	RDANCE WITH PERM	IT:				ΠY	□n Øna □ne	
SE	CTION	J: STORM W	VATER POLL	UTION PRE	/ENTION PL/	AN				
ST	ORM W	ATER MANAG	EMENT MEET	S PERMIT RE	QUIREMENTS		□s ⊏		U ∅NA □NE	
DE	TAILS:									
1.	SWPPP UP	DATED AS NEEDED:	DATE OF LAST UP	DATE:				ΠY	□n Øna □ne	
2.	SITE MAP I	NCLUDING ALL DISCH	HARGES AND SURFAC	CE WATERS:				ΠY	□n Øna □ne	
3.	POLLUTION	N PREVENTION TEAM	IDENTIFIED:					ΠY	□n Øna □ne	
4.	POLLUTION	N PREVENTION TEAM	PROPERLY TRAINED	:				ΠY	□n Øna □ne	
5.	LIST OF PC	TENTIAL POLLUTAN	F SOURCES:					ΠY	□n Øna □ne	
6.	LIST OF PC	DTENTIAL SOURCES A	AND PAST SPILLS AND	D LEAKS:				ΠY	□n Øna □ne	
7.	ALL NON-S	TORM WATER DISCH	ARGES ARE AUTHOR	IZED:				ΠY	□n Øna □ne	
8.	LIST OF ST	RUCTURAL BMPS:						ΠY	□n Øna □ne	
9.	LIST OF NO	ON-STRUCTURAL BMF	PS:					ΠY	□n Øna □ne	
10.	BMPS PRO	PERLY OPERATED AI	ND MAINTAINED:						□n Øna □ne	
11.	INSPECTIC	NS CONDUCTED AS	REQUIRED:					ΠY	□n Øna □ne	

Permit #: AR0044016

FLOW CALCULATION SHEET											
Date:	10-6-08	— Т	ime: 14	36							
		•									
Head in	Inches:	3.2	Feet:	.2666							
T 0	0. (D						-1				
Type &	Size of Pr	imary Flow I	vieasurer	nent Device	e: 3 inch F	arshall F	lume				
Name 8	Model of	Secondary	Flow Mea	asurement	Device: H	lydro Ran	ger 200				
Date of	last Calib	ration of Sec	ondary F	low Device	· Septemb	er 2008					
Date of			orraary r			01, 2000					
Recorde	ed Flow at	t Date & Tim	e Listed A	Above: 0.	0315 MGD		(22.10 GPM)				
Calcula	tod Flow a	at Date & Tin	no Listod	Abovo:	0.0340 MGI	<u>ו</u>					
							Edition) (Table 9-4)				
			· · ·			-					
% Error		0.0315	-	0.0340	— X 10	0 -7					
			0.0340								
			-								
% Error	' =				— X 10	0					
			_			I					
% Error	_		X 100								
/0											
% Error			X 100								
	-		X 100								
% Error	=		% -7	.35%							
	•										
Comme	ents: Le	ess than +/-	10% erro	or - OK							

ADEQ Water NPDES	Inspection	AFIN	N: 33-00036		Pe	ermit #: AR004	4016		
		DN	MR Calculat	tion Che	ck				
			(001))					
Reporting Period:	From	08	08	01	То	08	08	31	
		Year	Month	Day		Year	Month	Day	
Parameter Checked		al Coliform Loading Mass	_				ntration nthly		
	Mo. A	Avg lbs/	/day	Mo. A	vg	mg/l	Daily Max	x mg/l	
Reported Value:		N/A			N/A		<1		
Calculated Value: N/A					N/A <1				
Permit Value:		N/A			N/A		200)	
				Coloni	es per 1	00 ml	Colonies per 100 ml		

If calculated value does not equal reported value, explain: Equal, Facility tests one time per month.

Comments:

- 1. The facility was in the process of building two more sand bed filters, but no specifications were sent to the Department for review before performing the construction. This is a violation of The Water and Air Pollution Control Act (8-4-217) b, 1, A.
- 2. A review of the DMR's revealed that the facility was not including the name and address of the outside laboratory performing the sampling and /or analyses. This is a violation of Part II, Section C, Item 5, of the permit.
- 3. The facility was not preparing and maintaining on file a certification statement on each batch of land applied Biosolids as required by the permit. This is a violation of Part III, Section A, Item 6, of the permit.
- 4. The biosolids had not been monitored at the frequency as required by the permit. This is a violation of Part III, Section B, Items 1 & 2, of the permit.

	Water	Division C	onstruction Storm V	Vater Photog	graphic Evide	nce Sheet	
Location: A	R. Dept o	f Correctio	ns WWTP Approx. 2	.5 miles north	n of Calico Roo	ck, AR. (Izar	d County)
Photographer:	Mike K	ennedy		Witness:	Danny Blan	kenship, Ma	intenance
Photo # 1	Of	2		Date:	10-6-08	Time:	1255
Description:	This is a	a view of th	e new Sand Bed Filte	ers being built	t on the east sid	le of the exis	ting filters.
Photographer:	Mike K	ennedy	a de la deve de la regiona de la definidad e de la deve parte contra presidente de la casa de devenira	Witness:	Danny Blan	kenship, Ma	intenance
Photo # 2	Of	2		Date:	10-6-08	Time:	1255
Description:	This is a	another vie	w of the new filters lo	oking from w	vest to east.		

Permit #: AR0044016

ADEQ Water NPDES Inspection

honor and integrity in public service

Construction/Maintenance 7800 Correction Circle Pine Bluff, Arkansas 71603 Phone: (870) 267-6625

Fax: (870) 267-6617

042103 11-10-09

Arkansas Department of Correction

March 16, 2009

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

Re: AFIN: 33-00036 NPDES Permit No.: AR0044016

Mr. Mike Kennedy:

This is in response to the letter I received concerning the violations that were revealed during your latest inspection.

- 1. The facility was in the process of building two more sand bed filters, but no specifications were sent to the Department for review before performing the construction.
 - a. Upon making contact with ADEQ, work was stopped. The construction permit was applied for and the process is complete as of 3-16-09. Shane Byrum advises all paperwork (permit application, proof of publication, and proof of payment) has been received and forwarded.
- 2. A review of the DMR's revealed that the facility was not including the name and address of the outside laboratory performing the sampling and/or analyses.
 - a. McClelland Engineering is the contract monitor for the wastewater treatment at North Central Unit and we have discussed the discrepancies in the paperwork. McClelland has agreed to make the necessary changes.
- 3. The facility was not preparing and maintaining on file a certification statement on each batch of land applied biosolids as required by the permit.
 - a. As of 3-16-09, we have contacted McClelland Engineering to do the

biosolid testing as required by the permit.

- 4. The biosolids had not been monitored at the frequency as required by permit.
 - a. The biosolids will now be monitored as required by the permit.

I appreciate your patience in this matter. If you have any questions, please feel free to contact me at 870-267-6625 or e-mail me at david.cruseturner@arkansas.gov.

Sincerely,

1

David Cruseturner Assistant Director – Construction Division

Cc: Danny Blankenship, Unit Maintenance Coordinator – North Central Unit Leon Starks, Construction/Maintenance Coordinator