

January 23, 2009

Scotty Jones, Manager City of Trumann WWTP 106 E. Main St. Trumann, AR 72472

**RE:** Waste Water Treatment Plant

AFIN: 56-00047 NPDES Permit No.: AR0035602

Dear Mr. Jones:

On December 23, 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:

The facility is currently under a CAO (Consent Administrative Order) - LIS# 08-133.

A brief review of the laboratory and records revealed that significant improvements had been made since the previous inspection. A more thorough review of these areas will be conducted within the next month when both Mr. Jones and the new laboratory technician are available.

The curtains in the lagoons have not yet been replaced. According to Mr. Jones, new curtains have been ordered and contractors are scheduled to start work the week of January 26, 2009, weather permitting.

It appeared that drastic improvements have been made since the previous inspection.

A written response to this letter is not required. You should continue to adhere to the conditions of the current CAO including the submission of all corrective action reports.

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

«Cognizant\_Official», «Facility\_Name» January 23, 2009 Page 2

If I can be of any assistance, please contact me at walker@adeq.state.ar.us or 870-935-7221 ext.-12.

Sincerely,

Brent L. Walker District 3 Field Inspector

Bred & Walter

Water Division

cc: Water Division Enforcement Branch

Water Division Permits Branch

ADEQ Water NPDES Inspection	AFIN: « <b>AFIN</b> »	Permit #: «Permit_»

<b>⊕</b>	≣ <b>P</b> A											Form Approved OMB No. 2040-0003		
		UNIT	ED STATE		ENTAL PROTECT	ΓΙΟΝ AGE	NCY							
	NPDE	SC	Com		n, D.C. 20460 <b>e Inspe</b>	ectio	n I	Report						
				-	Section A: Nat									
	Transaction Code	_	_	NPDES				Yr/M	Io/Day	_	Ins	pec. Type Inspector Fac. Type		
1	N 2 5 3 A R	0	0 3	5 6	0 2 1	1 12	0	8 1 2	2 2	<b>3</b> 17	18	C 19 S 20 1		
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	Inspection Work Days	]	Facility E	Evaluation R	ating	BI	. (	QA .		 I		Reserved		
	67 69		70	2	7	1 N	72	<b>N</b> 73		74 75		80		
						n B: Fa						1		
incli City	te and Location of Facility Inspected to the POTW name and NPDES permit of Trumann WWTP	numi		al users disc	charging to PO	TW, also	)	Entry Time/I 1300 12/23/				Permit Effective Date 11/1/2003		
Tru	v. 69 North 1/4 Mile N. of Hwy 198 mann, AR sett Co.	3						Exit Time/D 1645 12/23/				Permit Expiration Date 10/31/2008 (Under Renewal)		
	ne(s) of On-Site Representative(s)/Tity Jones/Manager/870-284-0418	itle(s)	/Phone a	nd Fax Nun	nber(s)						Oth	ner Facility Data		
Nan	ne, Address of Responsible Official/	Title/l	Phone an	d Fax Numl	her									
Scot	ty Jones/Manager/870-284-0418	Truc/I	none un	a i ax i tuiii	oci -			C	Contacted					
106	of Trumann WWTP E. Main St.							Yes  ✓	$\int_{ m No} [$	٦				
Tru	mann, AR 72472							i es 🗀						
			(S =		tion C: Areas y, M = Margin					iated)				
S	Permit	M		<b>Aeasureme</b>		M		erations & Ma		-	S	Sampling		
S	Records/Reports	M	Self-M	lonitoring l	Program	N	Slu	dge Handling	g/Disposa	l	S	Pollution Prevention		
M	Facility Site Review	N	Comp	liance Sche	dules	N	Pre	treatment			N	Multimedia		
S	Effluent/Receiving Waters	N	Labor			S		rm Water			N	Other:		
		Se	ction D:	Summary	of Findings/C	omment	s (Att	ach additiona	al sheets	if necessa	ry)			
Th	e facility is currently under a CAC	) - LI	S# 08-13	3 Scotty Jo	ones took over	as man	ager .	January 1, 20	008.					
Replacement of the lagoon curtains is scheduled to begin on or around January 26, 2009.														
There was a very minor air leak noted from a pipe between the two lagoons during the course of the inspection. The leak was only observable due to air bubbles appearing in puddled water on the ground due to ongoing rainfall. Mr. Jones stated he was previously unaware of the leak but would repair is as soon as the														
weather permitted excavation in the area. No decrease in treatment effectiveness or efficiency is likely - due to the small magnitude of the leak.														
Records, laboratory and operations and maintenance are greatly improved since the last inspection. See the attached letter and inspection report for details.														
				Agency/Offi AR Dept. of			Fax tal Quality-Jo	onesboro			Date			
Brei	nt L. Walker Bred L Web	W.						(0) 935-4715 (				January 23, 2009		
Sign	nature of Reviewer				Agency/Office/Phone and Fax Numbers				Date					

ADEQ Water NPDES Inspection	AFIN: « <b>AFIN</b> »	Permit #: «Permit_»	
SECTION A: PERMIT VERIFICATION			
PERMIT SATISFACTORILY ADDRESSES	ORSERVATIONS		ZS DM DU DNA DNE
DETAILS:	OBOLINATIONS		13 DIVI DO DIVA DIVE
CORRECT NAME AND MAILING ADDRESS OF PERMIT			☑Y □N □NA □NE
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFER			
NUMBER AND LOCATION OF DISCHARGE POINTS AS			ØY □N □NA □NE
4. ALL DISCHARGES ARE PERMITTED:			Øy □n □na □ne
SECTION B: RECORDKEEPING AND	REPORTING EVALUATION		
RECORDS AND REPORTS MAINTAINED		<u> </u>	ZIS □M □U □NA □NE
DETAILS: A brief review of the records in			
inspection.			
1. ANALYTICAL RESULTS CONSISTENT WITH DATA REF	PORTED ON DMRS:		☑Y □N □NA □NE
2. SAMPLING AND ANALYSES DATA ADEQUATE AND IN	CLUDE:		□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 MAINT	TENANCE RECORDS ADEQUATE:		□S □M □U ☑NA □NE
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF I	EQUIPMENT MAINTENANCE AND REPAIR:		☑s ☐m ☐u ☐na ☐ne
5. EFFLUENT LOADINGS CALCULATED USING DAILY EF	FLUENT FLOW AND DAILY ANALYTICAL DATA:		☑Y □N □NA □NE
SECTION C: OPERATIONS AND MAI	NTENANCE		
TREATMENT FACILITY PROPERLY OPER	RATED AND MAINTAINED		IS ☑M □U □NA □NE
DETAILS: New lagoon curtains schedule	d for installation week of Jan. 26,	2009.	

inspection.	
ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS:	Øy □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:	Øy □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: New lagoon curtains scheduled for installation week of Jan. 26, 2009.	<u> </u>
1. TREATMENT UNITS PROPERLY OPERATED:	☑S ☐M ☐U ☐NA ☐NE
2. TREATMENT UNITS PROPERLY MAINTAINED: Replacement curtains for lagoons have been ordered.	□S □M 🗹U □NA □NE
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED:	□S □M □U ØNA □NE
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE:	□S □M □U ØNA □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:	Øs □m □u □na □ne
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE:	□Y □N □NA ☑NE
9. STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED:	Øy □n □na □ne
10. PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED:	Øy □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:	Øy □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

	ADEQ Water NPDES Inspection	AFIN: « <b>AFIN</b> »	Permit #: «Perm	it_»			
SI	ECTION D: SAMPLING						
PE	RMITTEE SAMPLING MEETS PERM	IIT REQUIREMENTS		⊠s □	M DU D	INA	□NE
DE	TAILS:						
1.	SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT:				ØY □N	I □NA	A □NE
2.	LOCATIONS ADEQUATE FOR REPRESENTATIVE SAM	PLES:			ØY □N	I □NA	A DNE
3.	FLOW PROPORTIONED SAMPLES OBTAINED WHEN F	REQUIRED BY PERMIT:			ØY □N	I □NA	A □NE
4.	SAMPLING AND ANALYSES COMPLETED ON PARAME	TERS SPECIFIED IN PERMIT:			ØY □N	I □NA	A DNE
5.	SAMPLING AND ANALYSES PERFORMED AT FREQUE	NCY SPECIFIED IN PERMIT:			ØY □N	I □NA	A DNE
6.	SAMPLE COLLECTION PROCEDURES ADEQUATE:				ØY □N	I □NA	A □NE
a	a. SAMPLES REFRIGERATED DURING COMPOSITING:				ØY □N	I □NA	A DNE
b	D. PROPER PRESERVATION TECHNIQUES USED:				ØY □N	I □NA	A □NE
C	c. CONTAINERS AND SAMPLE HOLDING TIMES CONFOR	RM TO 40 CFR 136:			ØY □N	I 🗆 N A	A □NE
7.	IF MONITORING IS PERFORMED MORE OFTEN THAN	REQUIRED ARE RESULTS REPORTED ON THE D	DMR:			I ⊠NA	A DNE
SI	ECTION E: FLOW MEASUREMEN	IT					
PE	ERMITTEE FLOW MEASUREMENT M	IEETS PERMIT REQUIREMENTS	3	□s Ø	м 🗆	JNA	□NE
DE	ETAILS: Flow meter was functioning	normally at the time of inspec	tion – logs ir	dicate d	occasion	nal	
m	omentary fluctuations that do not ag	ppear to affect accuracy of the	device – serv	ice tech	<u>ınician h</u>	nas b	<u>een</u>
ur	nable to find source of problem and	recommends replacement due	<u>to age of equ</u>	<u>uipment</u>			
1.	PRIMARY FLOW MEASUREMENT DEVICE PROPERLY	INSTALLED AND MAINTAINED: TYPE OF DEVI	CE: 9" Parshall Flu	<u>me</u>	ØY □N	I □NA	A DNE
2.	FLOW MEASURED AT EACH OUTFALL AS REQUIRED:				ØY □N	I □NA	A □NE
3.	SECONDARY INSTRUMENTS (TOTALIZERS, RECORD	ERS, ETC.) PROPERLY OPERATED AND MAINTA	INED:		ØY □N	I □n <i>i</i>	A DNE
4.	CALIBRATION FREQUENCY ADEQUATE:				ØY □N	I □NA	A □NE
5.	RECORDS MAINTAINED OF CALIBRATION PROCEDUR	RES:			ØY □N	I □NA	A □NE
6.	CALIBRATION CHECKS DONE TO ASSURE CONTINUE	ED COMPLIANCE:			ØY □N	I □NA	A DNE
7.	FLOW ENTERING DEVICE WELL DISTRIBUTED ACROS	SS THE CHANNEL AND FREE OF TURBULENCE:			ØY □N	I □NA	A □NE
8.	FLOW MEASUREMENT EQUIPMENT ADEQUATE TO H	ANDLE EXPECTED RANGE OF FLOW RATES:			ØY □N	I □n <i>i</i>	A DNE
9.	HEAD MEASURED AT PROPER LOCATION:				ØY □N	I □NA	A □NE
SI	ECTION F: LABORATORY						
PE	ERMITTEE LABORATORY PROCEDU	IRES MEET PERMIT REQUIREM	MENTS	s	M □U 🛭	ΖNA	
	ETAILS: Only a brief evaluation of the I	aboratory was conducted - a more	e thorough ev	aluation	will be co	ondu	cted
wi	thin the next month.						
1.	EPA APPROVED ANALYTICAL PROCEDURES USED (4		ES) :				
2.	IF ALTERNATIVE ANALYTICAL PROCEDURES ARE US	ED, PROPER APPROVAL HAS BEEN OBTAINED:					
3.	SATISFACTORY CALIBRATION AND MAINTENANCE O	F INSTRUMENTS AND EQUIPMENT:					
4.	QUALITY CONTROL PROCEDURES ADEQUATE:						
5.	DUPLICATE SAMPLES ARE ANALYZED ≥10% OF THE	TIME:					
6.	SPIKED SAMPLES ARE ANALYZED ≥10% OF THE TIME	E:					
7.	COMMERCIAL LABORATORY USED:				ØY □N	I □NA	A DNE
a	a. LAB NAME: Arkansas State University Ecotoxicology	<u>Facility</u>					
b	b. LAB ADDRESS: State University, AR						
C	c. PARAMETERS PERFORMED: Biomonitoring						
8.	BIOMONITORING PROCEDURES ADEQUATE:						
a	a. PROPER ORGANISMS USED:						
b	D. PROPER DILUTION SERIES FOLLOWED:						
C	E. PROPER TEST METHODS AND DURATION:						
c	d. RETESTS AND/OR TRE PERFORMED AS REQUIRED:				$\square$ Y $\square$ N	I □NA	A ⊠NE

					OBSERVATION	ONS			
BA	ASED ON	N VISUAL OBS	ERVATIONS C	DNLY			⊠s □	M □u	□NA □NE
DE	ETAILS:								
OL	JTFALL #:	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	COLC	R	OTHER
	001	None	None	Low	None	None	Light G	reen	
SE	ECTION	H: SLUDGE	DISPOSAL						
SL	UDGE D	DISPOSAL MEE	ETS PERMIT F	REQUIREMEN	TS		□s□	М□∪	⊠NA □NE
DE	TAILS:	Sludge remains	s in lagoon – fa	cility is plannir	ng to evaluate sl	udge depth durin	g curtain	replac	ement
1.	SLUDGE M	IANAGEMENT ADEQU	ATE TO MAINTAIN EF	FLUENT QUALITY:				s □м I	□U ØNA □NE
2.	SLUDGE R	ECORDS MAINTAINED	AS REQUIRED BY 40	) CFR 503:				s □м I	⊐u ⊠na □ne
3.	FOR LAND	APPLIED SLUDGE, TY	PE OF LAND APPLIE	D TO: (E.G., FOREST	, AGRICULTURAL, PUI	BLIC CONTACT SITE):			
SE	ECTION	I: SAMPLIN	G INSPECTION	ON PROCED	URES				
SA	MPLE F	RESULTS WITH	IIN PERMIT R	EQUIREMENT	ΓS		□s□	lм □u	☑NA □NE
DE	ETAILS:								
1.	SAMPLES	OBTAINED THIS INSPE	ECTION:					□y∣	□n Øna □ne
2.	TYPE OF S	AMPLE: GRAB:	□COMPOSITE: N	METHOD: FREQUE	ENCY:				
3.	SAMPLES	PRESERVED:						□Y I	□n Øna □ne
4.	4. FLOW PROPORTIONED SAMPLES OBTAINED:								
5.	SAMPLE O	BTAINED FROM FACIL	LITY'S SAMPLING DE\	/ICE:				□y∣	□N ☑NA □NE
6.	SAMPLE R	EPRESENTATIVE OF \	OLUME AND NATUR	E OF DISCHARGE:					□n Øna □ne
7.	SAMPLE S	PLIT WITH PERMITTEE	≣:					□Y∣	□N ☑NA □NE
8.	CHAIN-OF-	CUSTODY PROCEDU	RES EMPLOYED:						□n Øna □ne
9.	SAMPLES	COLLECTED IN ACCO	RDANCE WITH PERM	IT:				□y∣	□n Øna □ne
					VENTION PLA				
ST	ORM W	ATER MANAG	EMENT MEET	S PERMIT RE	QUIREMENTS	5		M □u	☑NA □NE
DE		No Exposure E			<u>Y</u>				
1.	SWPPP UF	PDATED AS NEEDED:_	_ DATE OF LAST UP	DATE:					□N □NA ☑NE
2.	SITE MAP	INCLUDING ALL DISCH	HARGES AND SURFA	CE WATERS:					□N □NA ☑NE
3.									
4.									
5.									
6.									
7.		STORM WATER DISCH	ARGES ARE AUTHOR	IZED:					□NA ØNE
8.		RUCTURAL BMPS:							□NA ØNE
9.	LIST OF NO	ON-STRUCTURAL BMF	PS:						□NA ØNE
10.	BMPS PRO	PERLY OPERATED AN	ND MAINTAINED:						□NA ØNE
11.	11. INSPECTIONS CONDUCTED AS REQUIRED:								_N □NA ☑NE

AFIN: «AFIN»

Permit #: «Permit\_»

ADEQ Water NPDES Inspection

FLOW CALCULATION SHEET										
Date: 12/23/08 Time: 1330										
Head in Inches: 8.5" Feet: 0.71										
Type & Size	e of Primary Flow N	Measureme	ent Device:	9" Parshall Flu	me					
Name & Mo	odel of Secondary	Flow Meas	urement De	evice: Ultrason	ic					
Date of last	Calibration of Sec	ondary Flo	w Device:	Fall 2008						
Recorded F	Flow at Date & Time	e Listed Ab	ove: <b>1.0</b> 9	97	(Facility Flow Meter)					
Calculated	Flow at Date & Tim	ne Listed A	bove: 1.	175						
(Flow is calcula	ted using flow charts in: IS	SCO Open Cha	nnel Flow Meas	surement Handbook-5 <sup>th</sup>	Edition)					
% Error =	Recorded Value Calcu	- Calcu	lated Value	X 100						
		1								
% Error =	1.097	│ -	1.175	X 100						
	-0.078									
% Error =	1.175	X 100								
% Error = <b>0.06</b> X 100										
70 LIIUI —	0.00	X 100								
% Error =	-6.6	%								
Comments:										

## **DMR Calculation Check**

Reporting Period: From 08 09 01 To 08 09 30

Year Month Day Year Month Day

Parameter Checked: TSS

Loading Concentration **Monthly** Mass Mo. Avg. - lbs/day 7-day Avg. - mg/l Mo. Avg. - mg/l 10.46 **Reported Value:** 71.35 15.5 10.46 **Calculated Value:** 71.35 15.5 90 **Permit Value:** 1336 135

If calculated value does not equal reported value, explain: <u>Equal</u>