

June 12, 2009

Honorable Marion Gill, Mayor City of Dumas P.O. Box 157 Dumas, Arkansas 71639

RE: Waste Water Treatment Facility

AFIN: 21-00045

NPDES Permit No.: AR0033987

Dear Mayor Gill:

On June 9, 2009, I conducted 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:

- 1. No documentation of calibration checks conducted on the totalizing flow meter to assure continued compliance. (repeat violation)
- 2. No documentation that the 30-day average percent removal for Biochemical Oxygen Demand or Carbonaceous Biochemical Oxygen Demand is at least eighty-five percent (85%). (repeat violation)
- 3. No documentation of analytical data or chain of custodies for the months of January thru May 2009. (repeat violation)
- 4. Inadequate calibration and maintenance of the totalizing flow meter. At the time of inspection, a calibration check revealed an 18.8% error between the recorded value and the calculated value.

The above items require your immediate attention. Please submit a written response to Cindy Garner, Water Division Enforcement Branch Manager, of this Department. The response should be mailed to the address below. The response should contain documentation describing the course of action taken to correct each item noted. The corrective action should be completed as soon as possible and the written response is due by **June 27, 2009**.

Honorable Marion Gill, Mayor City of Dumas June 12, 2009 Page 2

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) 247-5155.

Sincerely,

Steven L. Houderson

Steven L. Henderson District 6 Inspector Water Division

cc: Water Division Enforcement Branch Water Division Permits Branch

0>	PA	Form Approved OMB No. 2040-0003								
	UN									
	UNITED STATES ENVIRONMENTAL PROTECTION AGENCY Washington, D.C. 20460 NPDES Compliance Inspection Report									
			Section A: Nation							
	Francostion Code		A Nation	liai Data	Yr/Mo/Day	Increase Trung Increasion Factor				
Transaction CodeNPDES1N253AR003398711120						Inspec. Type Inspector Fac. Type 18 C 19 S 20 1				
	A F I N 2 1	- 0 0 0	4 5	Remarks						
	Inspection Work Days	Facility Evaluation R	ating 1	BI	QA	Reserved				
	67 0 0 1 69	70 2	71	N 72	2 N 73 74 75	80				
			Section I	B: Facilit	y Data					
Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) Entry Time/Date Permit Effective Date City of Dumas WWTP 9:00 a.m. 6/9/09 November 1, 2006										
Sect	Approximately ¼ mile North of Highway 165Exit Time/DatePermit Expiration DateSection 25, Township 9 South, Range 4 West11:50 a.m. 6/9/09October 31, 2011									
	Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Other Facility Data Patrick Fitzgerald, Operator (870) 382-2121 (870) 382-6846									
Nan	e, Address of Responsible Official/Title	e/Phone and Fax Numb	ber			Discharge Location:				
	ion Gill, Mayor of Dumas				Contacted	N 33 53' 33" W 91 27' 42"				
P.Ö	Box 157				Yes No					
Dun	as, Arkansas 71639									
					During Inspection atisfactory, N = Not Evaluated)					
S	Permit U	Flow Measuremen	nt	S O	perations & Maintenance	S Sampling				
U	Records/Reports U	Self-Monitoring F	rogram	S S	ludge Handling/Disposal	N Pollution Prevention				
S	Facility Site Review N	Compliance Sche	dules	N P	retreatment	N Multimedia				
S	Effluent/Receiving Waters N	Euboratory			torm Water	Other:				
			_	ments (A	Attach additional sheets if necessary)					
Th	e following violations were not	• -		4 . 4 . 1:						
	1. No documentation of calibi continued compliance. (rep		auciea on ine	ioiaiizi	ng flow meter to assure					
	2. No documentation that the	30-day average p								
Demand or Carbonaceous Biochemical Oxygen Demand is at least eighty-five percent										
	(85%). (repeat violation) 3. No documentation of analy	tical data or chair	n of custodies	for the	months of January thru May	2009. (repeat violation)				
			•	•		a calibration check revealed an				
	18.8% error between the recorded value and the calculated value.									
	ne(s) and Signature(s) of Inspector(s)		Agency/Office/			Date				
H	TA Handler Steven L. Hender	rson	ADEQ/ White I	Hall/ (870	0) 247-5155/ (870) 247-5185	June 12, 2009				
Sig	Signature of Reviewer Agency/Office/Phone and Fax Numbers Date									

ADEQ Water NPDES Inspection	
ADE & Water N DEO Inspection	

AFIN: 21-00045

SECTION A: PERMIT VERIFICATION	
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS	Øs 🗆 m 🗇 🛛 🗠 🗛 🗠 NE
DETAILS:	
1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE:	My 🗆n 🗆na 🗆ne
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES:	DY DN ØNA DNE
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT:	My On Ona One
4. ALL DISCHARGES ARE PERMITTED:	
SECTION B: RECORDKEEPING AND REPORTING EVALUATION	
RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT	
DETAILS: No documentation of analytical data or chain of custodies for the months of	
January thru May 2009. (repeat violation)	
1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS:	
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE:	
a. DATES AND TIME(S) OF SAMPLING:	
b. EXACT LOCATION(S) OF SAMPLING:	
c. NAME OF INDIVIDUAL PERFORMING SAMPLING:	
d. ANALYTICAL METHODS AND TECHNIQUES:	
e. RESULTS OF CALIBRATIONS:	
f. RESULTS OF ANALYSES:	Dy On Ona Øne
g. DATES AND TIMES OF ANALYSES:	DY DN DNA ØNE
h. NAME OF PERSON(S) PERFORMING ANALYSES:	DY DN DNA ØNE
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE:	OS OM OU ONA ØNE
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR:	Øs 🗆m 🗇u 🖾na 🖾ne
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA:	Dy On Ona Øne
SECTION C: OPERATIONS AND MAINTENANCE	
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED	ØS OM OU ONA ONE
DETAILS:	
1. TREATMENT UNITS PROPERLY OPERATED:	Øs 🗆m 🗇u 🖾na 🖾ne
2. TREATMENT UNITS PROPERLY MAINTAINED:	Øs 🗆m 🗇u 🖾na 🖾ne
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED:	Øs 🗆m 🗇u 🖾na 🖾ne
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE:	Øs 🗆m 🗇u 🖾na 🖾ne
5. ALL NEEDED TREATMENT UNITS IN SERVICE:	Øs 🗆m 🗇u 🖾na 🖾ne
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED:	Øs 🗆m 🗇u 🖾na 🖾ne
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED:	
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE:	
9. STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED:	
10. PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED:	
11. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR:	
12. IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED:	
13. HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS:	
14. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT:	
15. IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT:	DY DN ØNA DNE

SECTION D: SAMPLING	
PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS	
DETAILS:	
1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT:	
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES:	
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT:	Øy 🗆n 🗆na 🗇ne
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:	
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: Image: Market M Market Market Mark
SECTION E: FLOW MEASUREMENT	
PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIRE	MENTS DS DM DU DNA DNE
DETAILS: No documentation of calibration checks conducted on the totalizin (repeat violation)	g flow meter to assure continued compliance.
1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: TYPE C	DF DEVICE: 9" Parshall Flume IV IN INA INE
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED:	
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AN	D MAINTAINED: ØY IN INA INE
4. CALIBRATION FREQUENCY ADEQUATE: Last calibration= August 7, 2008	
5. RECORDS MAINTAINED OF CALIBRATION PROCEDURES:	
6. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE:	
7. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURE	BULENCE: DY DNA DNA
8. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW F	RATES:
9. HEAD MEASURED AT PROPER LOCATION:	
SECTION F: LABORATORY	
PERMITTEE LABORATORY PROCEDURES MEET PERMIT REC	QUIREMENTS DS DM DU DNA ØNE
DETAILS: No analytical data available for review.	
1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(B) FC	
2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN O	
3. SATISFACTORY CALIBRATION AND MAINTENANCE OF 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:	
7. COMMERCIAL LABORATORY USED:	
a. LAB NAME: McClelland Consulting Engineers Arkansas	Analytical, Inc.
b. LAB ADDRESS: 900 West Markham, Little Rock, Arkansas 72201 11701 I-3	0, Bldg. 1, Suite 115, Little Rock Arkansas
	Bio-monitoring
8. BIOMONITORING PROCEDURES ADEQUATE:	
a. PROPER ORGANISMS USED:	
b. PROPER DILUTION SERIES FOLLOWED:	
c. PROPER TEST METHODS AND DURATION:	
d. RETESTS AND/OR TRE PERFORMED AS REQUIRED:	

AFIN: 21-00045

SECTION G: EFFLUENT/RECEIVING WATERS OBSERVATIONS											
BASED ON VISUAL OBSERVATIONS ONLY ØS DM DU DNA DNE											
DETAILS:											
OUTFALL #:	OTHER										
001	None	None	None	None	None	Clear					
SECTION	H: SLUDGE	DISPOSAL									
SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS VIS DM DU DNA DNE											
DETAILS:					·						
1. SLUDGE M	ANAGEMENT ADEQU	ATE TO MAINTAIN EF	FLUENT QUALITY:			₽s					
2. SLUDGE R	ECORDS MAINTAINED	D AS REQUIRED BY 40) CFR 503:			□s	🗆 m 🗇 u 🖉 na 🗇 ne				
3. FOR LAND	APPLIED SLUDGE, TY	PE OF LAND APPLIE	D TO: (E.G., FOREST,	AGRICULTURAL, PUE	BLIC CONTACT SITE):						
SECTION	I: SAMPLIN	G INSPECTIO	ON PROCEDU	JRES							
SAMPLE R	ESULTS WITH	IN PERMIT R	EQUIREMENT	S		□s □m	□u □na Øne				
DETAILS:					· · · · · ·						
1. SAMPLES	OBTAINED THIS INSPI	ECTION:					Dy On Ona Øne				
2. TYPE OF S	AMPLE: GRAB:		IETHOD: FREQUE	NCY:							
3. SAMPLES	PRESERVED:						□y □n □na Øne				
4. FLOW PROPORTIONED SAMPLES OBTAINED:											
5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE:											
6. SAMPLE REPRESENTATIVE OF VOLUME AND NATURE OF DISCHARGE:											
7. SAMPLE SI	PLIT WITH PERMITTEI	E:					□y □n □na Øne				
8. CHAIN-OF-	8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED:										
9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT:											
SECTION	J: STORM W	VATER POLL	UTION PREV	/ENTION PLA	AN						
STORM W	ATER MANAG	EMENT MEET	S PERMIT RE	QUIREMENTS		□s □m	□u □na Øne				
DETAILS:											
1. SWPPP UP	DATED AS NEEDED:	DATE OF LAST UP	DATE:								
2. SITE MAP I	NCLUDING ALL DISCH	HARGES AND SURFAC	CE WATERS:								
3. POLLUTION	N PREVENTION TEAM	IDENTIFIED:					DY DN DNA ØNE				
4. POLLUTION	N PREVENTION TEAM	PROPERLY TRAINED	:				DY DN DNA ØNE				
5. LIST OF POTENTIAL POLLUTANT SOURCES:											
6. LIST OF PC	DTENTIAL SOURCES A	AND PAST SPILLS AND	D LEAKS:				□y □n □na Øne				
7. ALL NON-S	TORM WATER DISCH	ARGES ARE AUTHOR	IZED:				□y □n □na Øne				
8. LIST OF ST	RUCTURAL BMPS:						□y □n □na Øne				
9. LIST OF NO	ON-STRUCTURAL BMF	PS:					□y □n □na Øne				
10. BMPS PRO	PERLY OPERATED AI	ND MAINTAINED:					□y □n □na Øne				
11. INSPECTIC	NS CONDUCTED AS	REQUIRED:					□y □n □na Øne				

ADEQ Water NPDES Inspection

AFIN: 21-00045

FLOW CALCULATION SHEET									
Date: Ju	ne 9, 2009	l ime: 1	<u>1:00 a.m.</u>						
Head in Ind	ches: 5 1/2	Fee	et: .585						
Type & Siz	e of Primary	Flow Measur	ement Dev	vice: 9" P	arshall Fli	Ime			
	e er i mary								
Name & M	odel of Seco	ndary Flow M	easuremer	nt Device	BEI Str	ip Chart Recorder			
		ndary r low w	casareme		Diroti				
Date of las	t Calibration	of Secondary	Flow Devi	ce: 8/7/0	8				
Recorded I	Flow at Date	& Time Liste	d Above:	.695 mgo	1	(Facility Flow Meter)			
		e & Time Liste		.585 mg	Jd				
(Flow is calculated using flow charts in: ISCO Open Channel Flow Measurement Handbook-5th Edition)									
% Error =	Recorded	Value - C	alculated V	/alue x	100				
Calculated Value									
% Error =	.695	-	.585	Y	100				
70 LIIUI =		.585		^	100				
0/ Error	.11	X 100							
% Error =	.585	X 100							
% Error =	.188	X 100)						
0/ 5-	40.0	0/							
% Error = 18.8 %									
Comments: Exceeds + / - 10% buffer									
L									

ADEQ Water NPDES	Inspection

DMR Calculation Check

* Due to a lack o	f availa	ble record	ds, a DMR o	calculation	check could	not be cond	ucted.
Reporting Period:	From]			
		Year	Month	Day	Year	Month	Day
Parameter Checked	:		_				
]	Loading Mass				tration thly	
	Mo. A	Avg lbs/	'day	Mo. Avg	mg/l	U U	g mg/l
Reported Value:							
Calculated Value:							
Permit Value:							

If calculated value does not equal reported value, explain:

Marion S. Gill Mayor

Johnny Brigham City Clerk

City of Dumas

P. O. Box 157 155 East Waterman Dumas, AR 71639 Telephone (870)-382-2121 Fax (870) 382-6846 Email address dumas@centurytel.net

<u>City Council</u> T. C. Pickett Roy Dalton James Jackson Christopher Hays Aaron White Franklin Healey Ronald Neal Dwayne Snyder

June 25, 2009

Ms. Cindy Garner Water Division Enforcement ADEQ 5301 Northshore Drive North Little Rock, AR. 72118-5317

Re: Compliance Inspection AFIM: 21-00265 NPDES Permit No. ARR000150

Dear Ms. Garner: Us the the the more relation of

Reference attached inspection report.

Item 1: We are and have been documenting the calibrating checks conducted on the totalizing flow meter. The documentation just could not be located at the time of the inspection. We will maintain documentation as directed.

Item 2: The average percent removal for Biochemical Oxygen Demand and c BOD will be calculated by the lab and reported to the city each month.

Item 3: Data will be mailed to the city by the lab each month along with the DMR for the corresponding month. This will include test results and the corresponding chain of custody. There will also be a copy of the percent removal calibration for the month and the composite sampling data.

Ttem 4: We will have the flow meter recalibrated.

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MPDES Pertait No. ARR060150
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Sincerely,

Mañans-Hill

Marion S. Gill Mayor City of Dumas

MSG/jb



June 12, 2009

Honorable Marion Gill, Mayor City of Dumas P.O. Box 157 Dumas, Arkansas 71639

RE: Waste Water Treatment Facility

AFIN: 21-00045

NPDES Permit No.: AR0033987

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ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY

5301 NORTHSHORE DRIVE / NORTH LITTLE ROCK / ARKANSAS 72118-5317 / TELEPHONE 501-682-0744 / FAX 501-682-0880

www.adeq.state.ar.us

AFTER FIVE DAYS RETURN TO CITY OF DUMAS Dumas, Arkansas 71639

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Ms. Cindy Garner Water Division Enforcement ADEQ 5301 Northshore Drive North Little Rock, AR. 72118-5317

72118+5317

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