

August 10, 2009

Terry McGinister, General Manager Helena Municipal Water and Sewer 702 Cherry Street Helena, Arkansas 72342

RE: Wastewater Treatment Facility

AFIN: 54-00083

NPDES Permit No.: AR0043389

Dear Mr. McGinister:

On August 5, 2009, I conducted a routine 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. No documentation of analytical data or chain of custody for 2009 sample events.
- 2. No documentation of effluent flow meter calculation checks being conducted to assure accuracy. (repeat violation)
- 3. Inadequate operation of the rectangular weir used as the primary flow measuring device. The weir has been dropped well below the bottom of the staff gauge. (repeat violation)
- 4. No documentation that the 30-day average percent removal for Biochemical Oxygen Demand is at least eighty-five percent (85%). (repeat violation)
- 5. No documentation of commercial laboratory used on the Discharge Monitoring Report.
- 6. Inadequate preservation of composite sample. (Not refrigerated or iced)

The above items require your immediate attention. Please submit a written response to Cindy Garner, Water Division Enforcement Branch, of this Department. This response should be mailed to the address below. This response should contain documentation describing the course of action taken to correct each item noted. This corrective action should be completed as soon as possible. The written response is due by **August 21, 2009**.

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

Terry McGinister, General Manager Helena Municipal Water and Sewer August 6, 2009 Page 2

If I can be of any assistance, please contact me at (870) 247-5155.

Sincerely,

Steven J. Houderson

Steven L. Henderson District 6 Inspector Water Division

cc: Water Division Enforcement Branch Water Division Permits Branch

\$	P A	Form Approved OMB No. 2040-0003							
	UNITED STATES ENVIRONMENTAL PROTECTION AGENCY Washington, D.C. 20460 NPDES Compliance Inspection Report								
		5 Compilai			-				
		NPDES	Section A: Nation	hal Data S	ystem Coding Yr/Mo/Day				
1	N253AR0	Inspec. Type Inspector Fac. Type 18 C 19 S 20 1							
L	A F I N 5 4								
	Inspection Work Days	Facility Evaluation	Rating I	BI	QA	Reserved			
	67 0 0 1 69	70 1	71	N 72	N 73 74 75	80			
			Section H	B: Facility	Data				
inclı City	e and Location of Facility Inspected de POTW name and NPDES permit of Helena WWTP	number)	0.0	V, also	Entry Time/Date 9:00 a.m. 8/5/09	Permit Effective Date February 1, 2004			
Sect	oximately 1.5 miles West of the Hwy on 24, Township 2 South, Range 4 ips County, Arkansas		rsection		Exit Time/Date 12:00 noon 8/5/09	Permit Expiration Date <i>January 31, 2009</i>			
	e(s) of On-Site Representative(s)/Tit tene Collier, Class III Operator	itle(s)/Phone and Fax N (870) 338-7438	umber(s)			Other Facility Data			
Terr Hele 702	Name, Address of Responsible Official/Title/Phone and Fax Number Facility Location: Terry McGinister, General Manager (870) 338-7438 (870) 338-7477 Fax N 34 30' 00" Helena Municipal Water and Sewer Yes Mo Yes Mo Yes Mo								
			ection C: Areas Ev ory, M = Marginal,		During Inspection isfactory, N = Not Evaluated)				
s	Permit	U Flow Measurer		a	perations & Maintenance	U Sampling			
U	Records/Reports	U Self-Monitorin	g Program	S Sh	udge Handling/Disposal	N Pollution Prevention			
S	Facility Site Review	N Compliance Sc	nedules	N Pr	etreatment	N Multimedia			
S	Effluent/Receiving Waters	N Laboratory			orm Water	N Other:			
				ments (At	ttach additional sheets if necessary	y)			
 At the time of inspection, the following violations were noted: No documentation of analytical data or chain of custody for 2009 sample events. No documentation of effluent flow meter calibration checks being conducted to assure accuracy. (repeat violation) Inadequate operation of the rectangular weir used as the primary flow measuring device. The weir has been dropped well below the bottom of the staff gauge. (repeat violation) No documentation that the 30-day average percent removal for Biochemical Oxygen Demand is at least eighty-five percent (85%). (repeat violation) No documentation of the commercial laboratory used on the Discharge Monitoring Report. Inadequate preservation of composite sample. (Not refrigerated or iced) 									
	ne(s) and Signature(s) of Inspector(s)		Agency/Office/ ADEQ/ White H	Telephone Hall/ (870)	/Fax) 247-5155/ (870) 247-5185	Date August 6, 2009			
Signature of Reviewer Agency/Office/Phone and Fax Numbers Date						Date			

ADEQ Water NPDES Inspection

AFIN: 54-00083

Permit #: AR0043389

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	
DETAILS: No documentation of analytical data or chain of custody for 2009 sample events	S
1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS:	
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE:	OS OM OU ONA ØNE
a. DATES AND TIME(S) OF SAMPLING:	DY DN DNA ØNE
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:	
g. DATES AND TIMES OF ANALYSES:	
h. NAME OF PERSON(S) PERFORMING ANALYSES:	
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE:	OS OM OU ONA ØNE
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR:	OS OM OU DINA ONE
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA:	
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: 1Class II, 1 Class II	Øs 🗆m 🗇u 🗇na 🗇ne
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED:	OS OM OU ØNA ONE
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 On Øna One

Permit #: AR0043389

SECTION D: SAMPLING					
PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS					
DETAILS:					
1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT:					
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES:	Øy 🛛 n 🖓 na 🖓 ne				
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT:	Dy 🗹n Ona One				
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT:	Øy 🛛 n 🖓 na 🖓 ne				
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT:	Øy 🛛 n 🖓 na 🖓 ne				
6. SAMPLE COLLECTION PROCEDURES ADEQUATE:	Øy 🛛 n 🗆 na 🖾 ne				
a. SAMPLES REFRIGERATED DURING COMPOSITING:					
b. PROPER PRESERVATION TECHNIQUES USED:					
c. CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136: No analytical data or chain of custody					
7. IF MONITORING IS PERFORMED MORE OFTEN THAN REQUIRED ARE RESULTS REPORTED ON THE DMR:					
SECTION E: FLOW MEASUREMENT					
PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS	□s □m ☑u □na □ne				
DETAILS: Weir has been dropped well below the bottom of staff gauge.					
1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: TYPE OF DEVICE: 4' Rectangui	ar Weir DY 🗹 N DNA DNE				
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED:					
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED:					
4. CALIBRATION FREQUENCY ADEQUATE: Last calibration: October 16, 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 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	□s □m □u □na Øne				
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 DNA ØNE				
3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT:	DY DN DNA ØNE				
4. QUALITY CONTROL PROCEDURES ADEQUATE:	DY DN DNA ØNE				
5. DUPLICATE SAMPLES ARE ANALYZED >10% OF THE TIME:					
6. SPIKED SAMPLES ARE ANALYZED <u>>10%</u> OF THE TIME:	DY DN DNA ØNE				
7. COMMERCIAL LABORATORY USED:					
a. LAB NAME: McClelland Consulting Engineers, Inc.					
b. LAB ADDRESS: 1311 West 2 nd Street, Little Rock, Arkansas 72201					
c. PARAMETERS PERFORMED: BOD5, TSS, FCB, pH, Acute Biomonitoring					
8. BIOMONITORING PROCEDURES ADEQUATE:					
a. PROPER ORGANISMS USED:					
b. PROPER DILUTION SERIES FOLLOWED:	Øy 🛛n 🖓na 🖓ne				
c. PROPER TEST METHODS AND DURATION:	Øy 🛛n 🖓na 🖓ne				
d. RETESTS AND/OR TRE PERFORMED AS REQUIRED:					

ADEQ Water NPDES Inspection
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SECTION G: EFFLUENT/RECEIVING WATERS OBSERVATIONS										
BASED ON VISUAL OBSERVATIONS ONLY										
DETAILS:										
OUTFALL #:	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	COLOR	OTHER			
001	none	none	none	none	none	Clear	none			
SECTION	SECTION H: SLUDGE DISPOSAL									
SLUDGE D	SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS									
DETAILS:										
1. SLUDGE M	ANAGEMENT ADEQU	ATE TO MAINTAIN EF	FLUENT QUALITY:			⊠s ⊡m				
2. SLUDGE R	ECORDS MAINTAINE	D AS REQUIRED BY 40) CFR 503:			⊡s ⊡m				
3. FOR LAND	APPLIED SLUDGE, T	YPE OF LAND APPLIE	D TO: (E.G., FOREST,	AGRICULTURAL, PUE	BLIC CONTACT SITE):					
SECTION	I: SAMPLIN	G INSPECTIO	ON PROCEDU	JRES						
	RESULTS WITH	HIN PERMIT R	EQUIREMENT	S			U 🗆 NA 🗹 NE			
DETAILS:										
	OBTAINED THIS INSP					ΠY	□n □na Øne			
2. TYPE OF S	AMPLE: GRAB:		IETHOD: FREQUE	NCY:						
3. SAMPLES	3. SAMPLES PRESERVED:									
4. FLOW PRC	4. FLOW PROPORTIONED SAMPLES OBTAINED:									
5. SAMPLE O	5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE:									
6. SAMPLE R	EPRESENTATIVE OF	VOLUME AND NATUR	E OF DISCHARGE:				□n □na Øne			
7. SAMPLE SI	PLIT WITH PERMITTE	E:								
8. CHAIN-OF-	CUSTODY PROCEDU	RES EMPLOYED:								
9. SAMPLES	COLLECTED IN ACCO	RDANCE WITH PERM	IT:			Πı	□n □na Øne			
		VATER POLL								
	ATER MANAG	EMENT MEET	S PERMIT RE	QUIREMENTS			U 🗆 NA 🗹 NE			
DETAILS:										
	· · · · · · · · · · · · · · · · · · ·	DATE OF LAST UP								
2. SITE MAP I	NCLUDING ALL DISCH	HARGES AND SURFAC	CE WATERS:							
3. POLLUTION	3. POLLUTION PREVENTION TEAM IDENTIFIED:									
5. LIST OF POTENTIAL POLLUTANT SOURCES:										
7. ALL NON-STORM WATER DISCHARGES ARE AUTHORIZED:										
8. LIST OF STRUCTURAL BMPS:										
	ON-STRUCTURAL BMF									
	PERLY OPERATED A									
11. INSPECTIC	ONS CONDUCTED AS	REQUIRED:					□n □na <i>D</i> /NE			

ADEQ Water NPDES Inspection

Permit #: AR0043389

FLOW CALCULATION SHEET										
* A flow calculation check was not conducted due to the fact that the weir had been dropped well below the bottom of the staff gauge and the extreme danger of sticking the weir with a ruler.										
Date: Time:										
Head in Inches: Feet:										
Type & Size	e of Primary Flow	Measurement Device								
Name & Mo	del of Secondar	y Flow Measurement D)evice:							
Date of last	Calibration of Se	econdary Flow Device:								
Recorded F	low at Date & Ti	me Listed Above:		(Facility Flow Meter)						
		T								
		ime Listed Above:	auromont Llondh	ook 5 th Edition)						
(Flow is calculat	ed using now chans in.	ISCO Open Channel Flow Mea								
	Recorded Value	e - Calculated Valu								
% Error =		culated Value	X 100							
% Error =		-	— X 100							
70 EITOT =			X 100							
	r									
% Error =		— X 100 —								
% Error =		X 100								
		X 100								
% Error = %										
Comments:										

ADEQ Water NPDES	Inspection AFI	AFIN: 54-00083			Permit #: AR0043389	
	D	MR Calculat	tion Check			
Reporting Period:	From		T	`o		
	Year		Day			Day
Parameter Checked:	Loading Mass				ntration nthly	
	Mo. Avg lbs	s/day	Mo. Avg		7-day Avg	g mg/l
Reported Value:						
Calculated Value:						
Permit Value:						

If calculated value does not equal reported value, explain:

* A DMR calculation check was not conducted due to a lack of analytical data.

Helena Municipal Water & Sewer

702 Cherry Street Helena-West Helena, Arkansas 72342

Owned and operated by the City of Helena-West Helena

870-338-7438 Fax 870-338-7477

August 18, 2009

Water Division Enforcement Section Arkansas Department of Environmental Quality 5301 Northshore Drive North Little Rock, AR 72218-5317

Re: AFIN: 54-00083

NPDES Permit No.: AR0043389

Dear Sir:

• •

In reference to routine compliance inspection of August 5, 2009, we have made the following corrections:

Item 1 – Spoke with Amber Bussell with McClelland Consulting Engineers and she will UPS the chain of custody forms and the analytical data we should receive documentation on 8-19-09.

Item 2 – We have issued a purchase order to Instrument & Supply, Inc. of Hot Springs, Arkansas to recalibrate the staff gauge so we can start performing the effluent flow meter calculation check.

Item 3 – Instrument & Supply, Inc. will recalibrate the staff gauge.

Item 4 – McClelland Consulting Engineers were contacted on August 14, 2009 to do a 30-day average percent removal of Biochemical Oxygen Demand.

Item 5 – The commercial laboratory used is McClelland Consulting Engineers, Inc. of Little Rock, Arkansas their name will appear on future Discharge Monitoring Reports.

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Item 6 - We are now adding ice to the sampler for composite sample preservation.

Please advise if additional information is required.

Sincerely. ME Limster

Terry McGinister General Manager Helena Municipal Water & Sewer System Owned and Operated by the City of Helena 702 Cherry Street Helena, Arkansas 72342 MEMPHIS TN 381

19 AUG 2009 PM 2 T



Water Division Enforcement Section Arkansas Department of Environmental Quality 5301 Northshore Drive North Little Rock, AR 72218-5317

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