



August 16, 2010

Mr. Larry Garrett, Director  
City of Huntsville  
P.O. Box 430  
Huntsville, AR 72740

RE: AFIN: 44-00018

NPDES Permit Tracking No.: AR0022004

Dear Mr. Garrett:

On June 24, 2010, I performed a complaint investigation/reconnaissance 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. Follow-up investigations were conducted on June 30, 2010, and July 12, 2010. This inspection revealed the following violations:

1. Placement of waste in such a manner that has the potential to cause the pollution of the waters of the State. This is in violation of the Arkansas Water and Air Pollution Control Act 8-4-217, (a)(1).
  - a. Biosolids had been land applied approximately 40-50 feet to Smyrna Creek and Holman Creek.
2. Biosolids were land applied approximately 40-50 feet to Smyrna Creek and Holman Creek. This is in violation of Part III, Condition 15 of your permit. When land applying biosolids, a 100 foot setback to all lakes, ponds, springs, streams, wetlands, and sinkholes must be met.
3. Biosolids were not evenly distributed in an area located in Whorton Field 1. This is in violation of Part III, Condition 11 of your permit. Biosolids must be spread evenly over the application area.

In addition, necessary steps must be taken to prevent biosolids from leaking out of the truck onto the roads during transport.

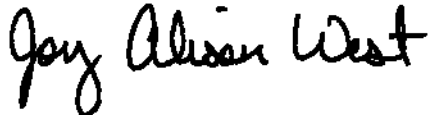
The above item requires your immediate attention. Please submit a written response to this finding to Cindy Garner, Water Division Enforcement Branch Manager. This response should be mailed to the address below. This response should contain documentation describing the course of action planned to correct the item noted. This corrective action should be completed as soon as possible, and the written response is due by August 26, 2010.

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

Larry Garrett, City of Huntsville  
August 16, 2010  
Page 2

If I can be of any assistance, please contact me at 479-267-0811, ext. 12 (email: west@adeq.state.ar.us).

Sincerely,

A handwritten signature in black ink that reads "Jay Alison West". The signature is written in a cursive, flowing style.

Alison West  
District 1 Field Inspector  
Water Division

cc: Water Division Enforcement Branch  
Water Division Permits Branch



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Washington, D.C. 20460

Form Approved  
OMB No. 2040-0003

## NPDES Compliance Inspection Report

### Section A: National Data System Coding

Transaction Code	NPDES	Yr/Mo/Day	Inspec. Type	Inspector	Fac. Type
1 [N] 2 [5] 3 [A] [R] [0] [0] 2 [2] [0] [0] [4]	11 12 [1] [0] [0] [6] [2] [4]	17 18 [R]	19 [C]	20 [1]	
Remarks					
Inspection Work Days	Facility Evaluation Rating	BI	QA	-----Reserved-----	
67 [ ] [ ] [ ] 69	70 [N]	71 [N]	72 [N]	73 [ ] [ ] [ ]	74 75 [ ] [ ] [ ] [ ] [ ] [ ] 80

### Section B: Facility Data

Name and Location of Facility Inspected ( <i>For industrial users discharging to POTW, also include POTW name and NPDES permit number</i> ) <b>City of Huntsville</b> <b>30187 Madison Hwy 23</b> <b>Huntsville, AR</b>	Entry Time/Date <b>2:10 p.m./6-24-10</b> <b>1:45 p.m./6-30-10</b> <b>2:30 p.m./7-12-10</b>	Permit Effective Date <b>10-1-04</b>
	Exit Time/Date <b>2:50 p.m./6-24-10</b> <b>3:30 p.m./6-30-10</b> <b>2:55 p.m./7-12-10</b>	Permit Expiration Date <b>9-30-09</b>
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) <b>Bill Eoff/Wastewater Plant Manager/479-738-2081/479-738-1285</b>		Other Facility Data <b>GPS @Outfall 001:</b> <b>N36-06-44.6</b> <b>W093-43-58.2</b>
Name, Address of Responsible Official/Title/Phone and Fax Number <b>Larry Garrett/Director/479-738-6929/479-738-1285</b> <b>Huntsville Water Utilities</b> <b>City of Huntsville</b> <b>P.O. Box 430</b> <b>Huntsville, AR 72740</b>		
		Contacted Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

### Section C: Areas Evaluated During Inspection

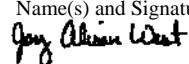
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

N	Permit	N	Flow Measurement	N	Operations & Maintenance	N	Sampling
N	Records/Reports	N	Self-Monitoring Program	U	Sludge Handling/Disposal	N	Pollution Prevention
N	Facility Site Review	N	Compliance Schedules	N	Pretreatment	N	Multimedia
N	Effluent/Receiving Waters	N	Laboratory	N	Storm Water	N	Other:

### Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

1. Placement of waste in such a manner that it has the potential to cause the pollution of the waters of the State.
2. Biosolids were land applied approximately 40 feet to Smyrna Creek and Holman Creek.
3. Biosolids were not evenly distributed in an area located in Whorton Field 1.

In addition, necessary steps must be taken to prevent biosolids from leaking out of the truck onto the roads during transport.



Name(s) and Signature(s) of Inspector(s)  Alison West	Agency/Office/Telephone/Fax AR Dept. of Environmental Quality-Fayetteville 479-267-0811, ext. 12/479-267-0819	Date August 7, 2010
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date

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

## Arkansas Department of Environmental Quality (ADEQ) Official Photograph Sheet

<b>Location:</b>	City of Huntsville Wastewater Facility							
<b>Photographer:</b>	John Fazio				<b>Witness:</b>	Alison West		
<b>Photo #</b>	1	<b>Of</b>	19		<b>Date:</b>	7-12-2010	<b>Time:</b>	2:45 p.m.
<b>Description:</b>	IMGP9407. Biosolids stored under cover.							
								
<b>Photographer:</b>	John Fazio				<b>Witness:</b>	Alison West		
<b>Photo #</b>	2	<b>Of</b>	19		<b>Date:</b>	7-12-2010	<b>Time:</b>	2:46 p.m.
<b>Description:</b>	IMGP9410. Biosolids.							
								



## Arkansas Department of Environmental Quality (ADEQ) Official Photograph Sheet

<b>Location:</b>	City of Huntsville Wastewater Facility								
<b>Photographer:</b>	John Fazio				<b>Witness:</b>	Alison West			
<b>Photo #</b>	3	<b>Of</b>	19		<b>Date:</b>	7-12-2010	<b>Time:</b>	2:46 p.m.	
<b>Description:</b>	IMGP9411. Lime storage.								
									
<b>Photographer:</b>	John Fazio				<b>Witness:</b>	Alison West			
<b>Photo #</b>	4	<b>Of</b>	19		<b>Date:</b>	7-12-2010	<b>Time:</b>	2:47 p.m.	
<b>Description:</b>	IMGP9413. An area where lime had been added to the biosolids.								
									





## Arkansas Department of Environmental Quality (ADEQ)

### Official Photograph Sheet

<b>Location:</b>	City of Huntsville Wastewater Facility						
<b>Photographer:</b>	John Fazio				<b>Witness:</b>	Alison West	
<b>Photo #</b>	5	<b>Of</b>	19		<b>Date:</b>	7-12-2010	<b>Time:</b> 2:47 p.m.
<b>Description:</b>	IMGP9414. Area where lime had been added to the biosolids.						
							
<b>Photographer:</b>	John Fazio				<b>Witness:</b>	Alison West	
<b>Photo #</b>	6	<b>Of</b>	19		<b>Date:</b>	7-12-2010	<b>Time:</b> 2:48 p.m.
<b>Description:</b>	IMGP9415. Leachate from biosolids is pumped into a manhole back to the plant.						
							

## Arkansas Department of Environmental Quality (ADEQ)

### Official Photograph Sheet

<b>Location:</b>	City of Huntsville Wastewater Facility						
<b>Photographer:</b>	John Fazio				<b>Witness:</b>	Alison West	
<b>Photo #</b>	7	<b>Of</b>	19		<b>Date:</b>	7-12-2010	<b>Time:</b> 2:48 p.m.
<b>Description:</b>	IMGP9417. Leachate pumped into a manhole near the biosolids storage building.						
							
<b>Photographer:</b>	John Fazio				<b>Witness:</b>	Alison West	
<b>Photo #</b>	8	<b>Of</b>	19		<b>Date:</b>	7-12-2010	<b>Time:</b> 2:48 p.m.
<b>Description:</b>	IMGP9418. Leachate pumped back to the plant.						
							

## Arkansas Department of Environmental Quality (ADEQ)

### Official Photograph Sheet

<b>Location:</b>	City of Huntsville Wastewater Facility						
<b>Photographer:</b>	John Fazio				<b>Witness:</b>	Alison West	
<b>Photo #</b>	9	<b>Of</b>	19		<b>Date:</b>	7-12-2010	<b>Time:</b> 2:48 p.m.
<b>Description:</b>	IMGP9421. The truck used for land application of biosolids.						





<b>Photographer:</b>	John Fazio				<b>Witness:</b>	Alison West	
<b>Photo #</b>	10	<b>Of</b>	19		<b>Date:</b>	7-12-2010	<b>Time:</b> 2:48 p.m.
<b>Description:</b>	IMGP9420. The truck used for land application of biosolids.						






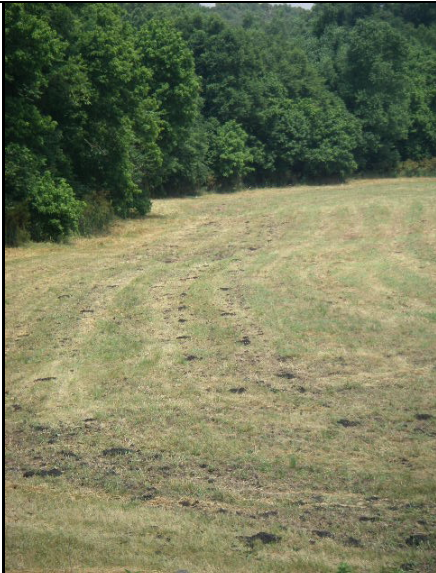
## Arkansas Department of Environmental Quality (ADEQ)

### Official Photograph Sheet

<b>Location:</b>	City of Huntsville Wastewater Facility							
<b>Photographer:</b>					<b>Witness:</b>			
<b>Photo #</b>	11	<b>Of</b>	19		<b>Date:</b>		<b>Time:</b>	
<b>Description:</b>	Google Earth Imagery of Whorton Field 1. Smryna Creek runs East to West. Holman Creek runs North.							
								
<b>Photographer:</b>	Alison West				<b>Witness:</b>	John Fazio		
<b>Photo #</b>	12	<b>Of</b>	19		<b>Date:</b>	6-24-2010	<b>Time:</b>	2:21 p.m.
<b>Description:</b>	IMGP4947. Bridge at Smyrna Creek on Hwy 23.							
								

## Arkansas Department of Environmental Quality (ADEQ)



### Official Photograph Sheet

<b>Location:</b>	City of Huntsville Wastewater Facility						
<b>Photographer:</b>	Alison West				<b>Witness:</b>	John Fazio	
<b>Photo #</b>	13	<b>Of</b>	19		<b>Date:</b>	6-24-2010	<b>Time:</b> 2:21 p.m.
<b>Description:</b>	IMGP4946. Whorton land application site. Sludge had been land applied approximately 40 feet to Smyrna Creek.						
							
<b>Photographer:</b>	Alison West				<b>Witness:</b>	John Fazio	
<b>Photo #</b>	14	<b>Of</b>	19		<b>Date:</b>	6-24-2010	<b>Time:</b> 2:21 p.m.
<b>Description:</b>	IMGP4948. Sludge land applied on Whorton Field 1. Smyrna Creek is immediately left of the tree line.						
							





## Arkansas Department of Environmental Quality (ADEQ)

### Official Photograph Sheet

<b>Location:</b>	City of Huntsville Wastewater Facility						
<b>Photographer:</b>	Alison West				<b>Witness:</b>	John Fazio	
<b>Photo #</b>	15	<b>Of</b>	19		<b>Date:</b>	6-24-2010	<b>Time:</b> 2:21 p.m.
<b>Description:</b>	IMGP4945. Whorton Field 1. Smyrna Creek is to the left of the tree line.						
							
<b>Photographer:</b>	Alison West				<b>Witness:</b>	John Fazio	
<b>Photo #</b>	16	<b>Of</b>	19		<b>Date:</b>	6-24-2010	<b>Time:</b> 2:16 p.m.
<b>Description:</b>	IMGP4941. Biosolids that were not spread evenly in Whorton Field 1.						
							

## Arkansas Department of Environmental Quality (ADEQ)

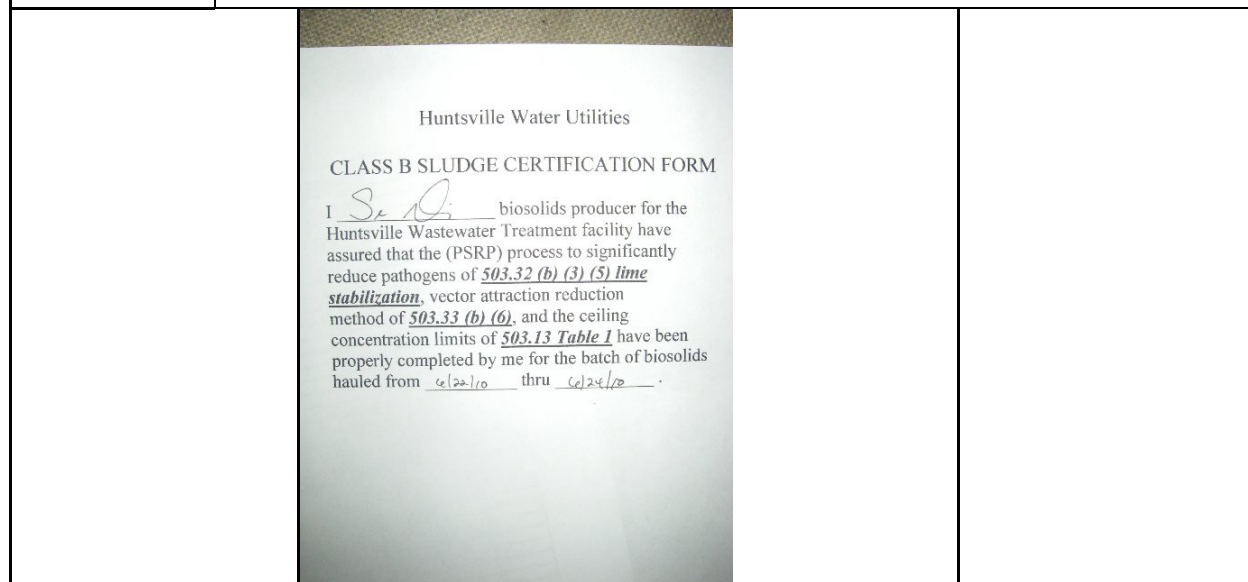
### Official Photograph Sheet

<b>Location:</b>	City of Huntsville Wastewater Facility						
<b>Photographer:</b>	Alison West				<b>Witness:</b>	NA	
<b>Photo #</b>	17	<b>Of</b>	19		<b>Date:</b>	6-30-2010	<b>Time:</b> 1:56 p.m.
<b>Description:</b>	IMGP4952. Biosolids were land applied approximately 40 feet to Smyrna Creek at Whorton Field 1.						
							
<b>Photographer:</b>	Alison West				<b>Witness:</b>	NA	
<b>Photo #</b>	18	<b>Of</b>	19		<b>Date:</b>	6-30-2010	<b>Time:</b> 1:59 p.m.
<b>Description:</b>	IMGP4953. Biosolids were land applied approximately 40-50 feet to Holman Creek at Whorton Field 1.						
							

## Arkansas Department of Environmental Quality (ADEQ)

### Official Photograph Sheet

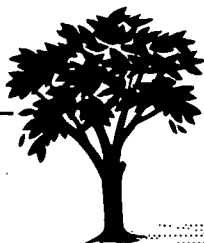
<b>Location:</b>	City of Huntsville Wastewater Facility						
<b>Photographer:</b>	Alison West				<b>Witness:</b>	NA	
<b>Photo #</b>	19	<b>Of</b>	19		<b>Date:</b>	6-30-2010	<b>Time:</b> 2:49 p.m.
<b>Description:</b>	IMGP4963. Class B Sludge Certification Form.						



<b>Photographer:</b>					<b>Witness:</b>		
<b>Photo #</b>		<b>Of</b>			<b>Date:</b>		<b>Time:</b>
<b>Description:</b>							

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## Huntsville Water Utilities

P.O. Box 430  
Huntsville, Arkansas 72740  
501-738-6929

Mrs. Cindy Garner  
Water Division Enforcement Branch Manager  
Arkansas Department of Environmental Quality  
5301 Northshore Drive  
North Little Rock, AR 72118-5317

08-18-2006

Re AFIN: 44-00018

NPDES Permit Tracking No.: AR0022004

Mrs. Cindy Garner,  
The following is my response to a complaint investigation inspection of the wastewater facility performed by Alison West.

We had a driver that applied Biosolids to close to Smyrna Creek and Holman Creek both in the same field. He allowed Biosolids to pile up in small piles behind the truck, not performing an even spread of the Biosolids and was not cleaning his tires off before leaving the field and entering the roadway.

1. As soon as this was brought to our attention by Alison we went immediately and spread the piles out.
2. The driver was transferred from the wastewater facility and another operator was transferred in from another department. He has been trained on sludge handling and the 100 foot setbacks he must meet from all lakes, ponds, springs, wetlands, sinkholes and streams.
3. He has also been instructed to clean tires and equipment before entering the roadway.

These corrective actions were done immediately after Alison's visit on June 30, 2010 which was the day I found out about the violation.

I apologize for our department having made this mistake but I am sure that it has been corrected. Our new sludge handler/driver is very responsible. I am assured that he has been properly trained and will take pride in doing a good job.

If you have any further questions or comments please feel free to contact me at 479-738-6929.

Sincerely,

Larry D. Garrett  
Director  
Huntsville Water Utilities



**Huntsville Water Utility**

P.O. Box 430  
Huntsville, Arkansas 72740  
501-738-6929

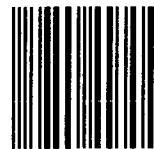
**CERTIFIED MAIL™**



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72118

U.S. POSTAGE  
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HUNTSVILLE, AR  
72740  
AUG 18, '10  
AMOUNT

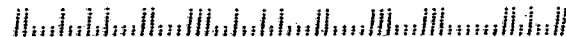
**\$5.54**

00045175-17

**RETURN RECEIPT  
REQUESTED**

Mrs. Cindy Garner  
Water Division Enforcement Branch Manager  
Arkansas Department of Environmental Quality  
5301 Northshore Drive  
North Little Rock, AR 72118-5317

721185317 RC15





August 23, 2010

Larry Garrett  
Huntsville Water Utilities  
PO Box 430  
Huntsville, AR 72740

RE: NPDES Permit No.: AR0022004      AFIN: 44-00018  
Response to Inspection

Dear Mr. Garrett:

The Department has received your response to the June 24, 2010 complaint inspection of your facility by our District Field Inspector, Alison West. Your letter appears to adequately address the discrepancies identified during the visit. The Department assumes the corrective actions taken will be maintained to ensure consistent compliance with the requirements of the permit. Acceptance of this response by the Department does not preclude any future enforcement action deemed necessary at this site or any other site.

The Department will keep the inspection and response on file. If future violations occur that require enforcement action, the Department will consider the inspection and response as required by the Pollution Control and Ecology Commission Regulation No. 7, Civil Penalties. This regulation requires the Department to consider the past history of your site and how expeditiously the violations were addressed in determining any civil penalty that may be necessary for any future violations.

If we need further information concerning this matter, we will contact you. Thank you for your attention to this matter. Should you have any questions, feel free to contact me at 501-682-0649 or you may e-mail me at [sawyer@adeq.state.ar.us](mailto:sawyer@adeq.state.ar.us).

Sincerely,

Sam Sawyer  
Enforcement Coordinator  
Water Division Enforcement Branch