ADEQ

A R K A N S A S
Department of Environmental Quality

September 9, 2010

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 September 1, 2010, 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:

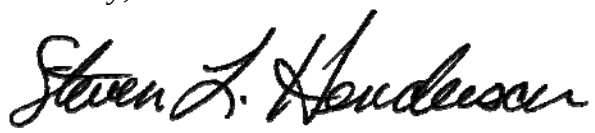
1. ***No documentation of calibration checks conducted on the totalizing flow meter to assure continued compliance. (repeat violation)***
2. ***Inadequate calibration and maintenance of the totalizing flow meter. At the time of inspection, a calibration check revealed a 10.48% error between the recorded value and the calculated value. This exceeds the maximum deviation of less than +/- 10%. According to facility records, the totalizing flow meter was last manually calibrated on August 25, 2009. (repeat violation)***

*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**, **September 19, 2010.***

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. Henderson
District 6 Inspector
Water Division

cc: Water Division Enforcement Branch
Water Division Permits Branch

EPA

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

NPDES Compliance Inspection Report

Form Approved
OMB No. 2040-0003

Section A: National Data System Coding

1	Transaction Code	2	NPDES	11	12	Yr/Mo/Day	17	18	Inspec. Type	19	Inspector	20	Fac. Type
	N	5	ARG003987			100901			C		S		1

Remarks: AFIN 21-00045

67	Inspection Work Days	69	70	Facility Evaluation Rating	71	BI	72	QA	73	Reserved	74	75	80
	001			2		N		N					

Section B: Facility 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 ***Approximately ¼ mile North of Highway 165*** ***Section 25, Township 9 South, Range 4 West*** ***Desha County, Arkansas***	***9:00 a.m. 9/1/10***	***November 1, 2006***
	Exit Time/Date ***11:50 a.m. 9/1/10***	Permit Expiration Date ***October 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	***Discharge Location:***
Name, Address of Responsible Official/Title/Phone and Fax Number ***Marion Gill, Mayor*** ***City of Dumas*** ***P.O. Box 157*** ***Dumas, Arkansas 71639***	Contacted Yes ☐ No ☑
	N 33 53' 33" ***W 91 27' 42"***

Section C: Areas Evaluated During Inspection
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

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

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

The following violations were noted during inspection:

1. ***No documentation of calibration checks conducted on the totalizing flow meter to assure continued compliance. (repeat violation)***
2. ***Inadequate calibration and maintenance of the totalizing flow meter. At the time of inspection, a calibration check revealed a 10.48% error between the recorded value and the calculated value. This exceeds the maximum deviation of less than +/- 10%. According to facility records, the totalizing flow meter was last manually calibrated on August 25, 2009. (repeat violation)***

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Telephone/Fax	Date
Steven L. Henderson	***ADEQ/ White Hall/ (870) 247-5155/ (870) 247-5185***	***September 2, 2010***
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date

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	☑S ☐M ☐U ☐NA ☐NE
DETAILS:	
1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS:	☑Y ☐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:	☑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 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:	
1. TREATMENT UNITS PROPERLY OPERATED:	☑S ☐M ☐U ☐NA ☐NE
2. TREATMENT UNITS PROPERLY MAINTAINED:	☑S ☐M ☐U ☐NA ☐NE
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED:	☑S ☐M ☐U ☐NA ☐NE
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE:	☑S ☐M ☐U ☐NA ☐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:	☑S ☐M ☐U ☐NA ☐NE
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE:	☑Y ☐N ☐NA ☐NE
9. STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED:	☑Y ☐N ☐NA ☐NE
10. PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED:	☐Y ☑N ☐NA ☐NE
11. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR:	☐Y ☑N ☐NA ☐NE
12. IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED:	☐Y ☐N ☑NA ☐NE
13. HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS:	☐Y ☐N ☑NA ☐NE
14. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT:	☐Y ☑N ☐NA ☐NE
15. IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT:	☐Y ☐N ☑NA ☐NE

SECTION D: SAMPLING

PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS	☑S ☐M ☐U ☐NA ☐NE

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:	☑Y ☐N ☐NA ☐NE
4.	SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT:	☑Y ☐N ☐NA ☐NE
5.	SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT:	☑Y ☐N ☐NA ☐NE
6.	SAMPLE COLLECTION PROCEDURES ADEQUATE:	☑Y ☐N ☐NA ☐NE
a.	SAMPLES REFRIGERATED DURING COMPOSITING:	☑Y ☐N ☐NA ☐NE
b.	PROPER PRESERVATION TECHNIQUES USED:	☑Y ☐N ☐NA ☐NE
c.	CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136:	☑Y ☐N ☐NA ☐NE
7.	IF MONITORING IS PERFORMED MORE OFTEN THAN REQUIRED ARE RESULTS REPORTED ON THE DMR:	☐Y ☐N ☑NA ☐NE

SECTION E: FLOW MEASUREMENT

PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS	☐S ☐M ☑U ☐NA ☐NE

DETAILS: ***No documentation of calibration checks conducted on the totalizing flow meter to assure continued compliance. (repeat violation)***

1.	PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: TYPE OF DEVICE: ***9" Parshall Flume***	☑Y ☐N ☐NA ☐NE
2.	FLOW MEASURED AT EACH OUTFALL AS REQUIRED:	☑Y ☐N ☐NA ☐NE
3.	SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED:	☐Y ☑N ☐NA ☐NE
4.	CALIBRATION FREQUENCY ADEQUATE: ***Last calibration= August 25, 2009***	☐Y ☑N ☐NA ☐NE
5.	RECORDS MAINTAINED OF CALIBRATION PROCEDURES:	☐Y ☑N ☐NA ☐NE
6.	CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE:	☐Y ☑N ☐NA ☐NE
7.	FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE:	☐Y ☑N ☐NA ☐NE
8.	FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES:	☑Y ☐N ☐NA ☐NE
9.	HEAD MEASURED AT PROPER LOCATION:	☑Y ☐N ☐NA ☐NE

SECTION F: LABORATORY

PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS	☑S ☐M ☐U ☐NA ☐NE

DETAILS:

1.	EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(B) FOR SLUDGES) :		☑Y ☐N ☐NA ☐NE
2.	IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED:		☐Y ☐N ☑NA ☐NE
3.	SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT:		☑Y ☐N ☐NA ☐NE
4.	QUALITY CONTROL PROCEDURES ADEQUATE:		☑Y ☐N ☐NA ☐NE
5.	DUPLICATE SAMPLES ARE ANALYZED ≥10% OF THE TIME:		☑Y ☐N ☐NA ☐NE
6.	SPIKED SAMPLES ARE ANALYZED ≥10% OF THE TIME:		☑Y ☐N ☐NA ☐NE
7.	COMMERCIAL LABORATORY USED:		☑Y ☐N ☐NA ☐NE
a.	LAB NAME: ***McClelland Consulting Engineers***	***Arkansas Analytical, Inc.***	
b.	LAB ADDRESS: ***900 West Markham, Little Rock, Arkansas 72201***	***11701 I-30, Bldg. 1, Suite 115, Little Rock Arkansas***	
c.	PARAMETERS PERFORMED: ***CBOD, BOD, TSS, NH3-N, DO, pH***	***Chronic Bio-monitoring***	
8.	BIOMONITORING PROCEDURES ADEQUATE:		☑Y ☐N ☐NA ☐NE
a.	PROPER ORGANISMS USED:		☑Y ☐N ☐NA ☐NE
b.	PROPER DILUTION SERIES FOLLOWED:		☑Y ☐N ☐NA ☐NE
c.	PROPER TEST METHODS AND DURATION:		☑Y ☐N ☐NA ☐NE
d.	RETESTS AND/OR TRE PERFORMED AS REQUIRED:		☑Y ☐N ☐NA ☐NE

SECTION G: EFFLUENT/RECEIVING WATERS OBSERVATIONS

BASED ON VISUAL OBSERVATIONS ONLY — ☑S ☐M ☐U ☐NA ☐NE

DETAILS:

OUTFALL #:	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	COLOR	OTHER
001	*None*	*None*	*None*	*None*	*None*	*Clear*	

SECTION H: SLUDGE DISPOSAL

SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS — ☑S ☐M ☐U ☐NA ☐NE

DETAILS:

1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY:	☑S ☐M ☐U ☐NA ☐NE
2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503:	☐S ☐M ☐U ☑NA ☐NE
3. FOR LAND APPLIED SLUDGE, TYPE OF LAND APPLIED TO: (E.G., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE):	

SECTION I: SAMPLING INSPECTION PROCEDURES

SAMPLE RESULTS WITHIN PERMIT REQUIREMENTS — ☐S ☐M ☐U ☐NA ☑NE

DETAILS:

1. SAMPLES OBTAINED THIS INSPECTION:	☐Y ☐N ☐NA ☑NE
2. TYPE OF SAMPLE: ☐GRAB:__ ☐COMPOSITE:__ METHOD:__ FREQUENCY:	
3. SAMPLES PRESERVED:	☐Y ☐N ☐NA ☑NE
4. FLOW PROPORTIONED SAMPLES OBTAINED:	☐Y ☐N ☐NA ☑NE
5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE:	☐Y ☐N ☐NA ☑NE
6. SAMPLE REPRESENTATIVE OF VOLUME AND NATURE OF DISCHARGE:	☐Y ☐N ☐NA ☑NE
7. SAMPLE SPLIT WITH PERMITTEE:	☐Y ☐N ☐NA ☑NE
8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED:	☐Y ☐N ☐NA ☑NE
9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT:	☐Y ☐N ☐NA ☑NE

SECTION J: STORM WATER POLLUTION PREVENTION PLAN

STORM WATER MANAGEMENT MEETS PERMIT REQUIREMENTS — ☐S ☐M ☐U ☐NA ☑NE

DETAILS:

1. SWPPP UPDATED AS NEEDED:__ DATE OF LAST UPDATE:	☐Y ☐N ☐NA ☑NE
2. SITE MAP INCLUDING ALL DISCHARGES AND SURFACE WATERS:	☐Y ☐N ☐NA ☑NE
3. POLLUTION PREVENTION TEAM IDENTIFIED:	☐Y ☐N ☐NA ☑NE
4. POLLUTION PREVENTION TEAM PROPERLY TRAINED:	☐Y ☐N ☐NA ☑NE
5. LIST OF POTENTIAL POLLUTANT SOURCES:	☐Y ☐N ☐NA ☑NE
6. LIST OF POTENTIAL SOURCES AND PAST SPILLS AND LEAKS:	☐Y ☐N ☐NA ☑NE
7. ALL NON-STORM WATER DISCHARGES ARE AUTHORIZED:	☐Y ☐N ☐NA ☑NE
8. LIST OF STRUCTURAL BMPS:	☐Y ☐N ☐NA ☑NE
9. LIST OF NON-STRUCTURAL BMPS:	☐Y ☐N ☐NA ☑NE
10. BMPS PROPERLY OPERATED AND MAINTAINED:	☐Y ☐N ☐NA ☑NE
11. INSPECTIONS CONDUCTED AS REQUIRED:	☐Y ☐N ☐NA ☑NE

FLOW CALCULATION SHEET

Date: **September 1, 2010** Time: **11:00 a.m.**

Head in Inches: **6** Feet: **.500**

Type & Size of Primary Flow Measurement Device: 9" Parshall Flume

Name & Model of Secondary Flow Measurement Device: BFI Strip Chart Recorder

Date of last Calibration of Secondary Flow Device: 8/25/2009

Recorded Flow at Date & Time Listed Above: **.615 mgd** (Facility Flow Meter)

Calculated Flow at Date & Time Listed Above: **.687 mgd**

(Flow is calculated using flow charts in: ISCO Open Channel Flow Measurement Handbook-5th Edition)

$$\% \text{ Error} = \frac{\text{Recorded Value} - \text{Calculated Value}}{\text{Calculated Value}} \times 100$$

$$\% \text{ Error} = \frac{.615 - .687}{.687} \times 100$$

$$\% \text{ Error} = \frac{-0.072}{.687} \times 100$$

$$\% \text{ Error} = -0.1048 \times 100$$

% Error = **-10.48** %

Comments: **Exceeds + / - 10% buffer**

DMR Calculation Check

Reporting Period: **From** **2010** (Year) **07** (Month) **01** (Day) **To** **2010** (Year) **07** (Month) **31** (Day)

Parameter Checked: **CBOD5**

	Loading Mass Mo. Avg. - lbs/day	Concentration Monthly Mo. Avg. - mg/l	Concentration Monthly 7-day Avg. - mg/l
Reported Value:	**40.0**	**7.5**	**14.5**
Calculated Value:	**40.0**	**7.5**	**14.5**
Permit Value:	**286**	**25**	**38**

If calculated value does not equal reported value, explain: ***EQUAL***

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

City Council
T. C. Pickett
Roy Dalton
James Jackson
Christopher Hays
Paula White
Franklin Healey
Ronald Neal
Dwayne Snyder

September 15, 2010

Mr. Steven Henderson
Water Division
ADEQ
5301 Northshore Drive
North Little Rock, AR. 72118-5317

Re: Waste Water Treatment Facility
AFIN: 21-00045
NPDES Permit No: AR0033987

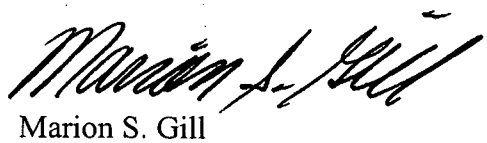
Dear Sir:

Reference your letter of September 9, 2010.

Item 1: We are and have been documenting the calibration 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 in the future.

Item 2: The totalizing flow meter will be recalibrated and maintained as directed.

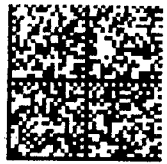
Sincerely,



Marion S. Gill
Mayor
City of Dumas

MSG/jb

City of Dumas
155 E. Waterman
P.O. Box 157
Dumas, Arkansas
71639



UNITED STATES POSTAGE
PITNEY BOWES
02 1P $ 000.44⁰
0004471791 SEP 16 2010
MAILED FROM ZIP CODE 71639

Mr. Steven Henderson
Water Division
ADEQ
5301 Northshore Drive
North Little Rock, AR. 72118-5317

72116$5317 R015

ADEQ
ARKANSAS
Department of Environmental Quality

September 30, 2010

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

RE: NPDES Permit No.: AR0033987 AFIN: 21-00045
Response to Inspection

Dear Mayor Gill:

The Department has received your response to the September 1, 2010 routine compliance inspection of your facility by our District Field Inspector, Steven Henderson. Your letter appears to adequately address the discrepancies identified during the visit however, it is imperative that you have the flow meter calibrated by an outside source at least once every year. 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.

Sincerely,

Sam Sawyer
Enforcement Coordinator
Water Division Enforcement Branch