ADEQ
ARKANSAS
Department of Environmental Quality

October 18, 2010

Mary Timmons, Utilities Manager
City of Mena
701 Mena St.
Mena, AR 71953

RE: NPDES & State Inspections

AFIN: 57-00423
57-00042

NPDES Permit No.: AR0036692
ARR000145
ARG640043
4426-WG-WR-2

Dear Ms. Timmons:

On October 5 & 6, 2010, I performed a routine compliance inspection of the above referenced permitted facilities 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:

AR0036692

1. The methods for performing the analyses on the Fecal coliform and TSS samples need to be referenced. All other parameters are being referenced on the bench sheets. Also, copies of these methods should be available on site.

2. Inadequate primary bar screen at the plant influent. Ten States Standards, enforceable standards adopted by the State, state that protection for pumps and other equipment shall be provided by trash racks, coarse bar racks or coarse screens and that the bar spacing between the bars should be no less that one inch. The bar screen at the plant has bar spacing of approximately three inches. This allows excessively large material into the influent pumps.

3. At the time of the inspection, the automatic sampler was collecting samples based on time. The collected composite samples should be flow weighted.

4. The Fecal coliform samples are to be incubated in the bath at 44.5 degrees Celsius, plus or minus 0.2 degrees. At inspection time, the thermometer showed an incubator temperature of 45.5 degrees Celsius.

ARR000145

No violations were found pertaining to this permit. The Department has approved certification for "No Exposure Exclusion" under this permit. The Renewal Certification date is March 26, 2010 and expires on June 30, 2014.

ARG640043

1. The times that the TRC samples are being analyzed are not available on the facilities records.

2. Samples are being collected quarterly as required, however; the results are being reported for the sample period just prior to the collection date.

4426-WG-WR-2

1. Land application of water treatment plant residuals was done in July and August 2008. A representative sample of the sludge to be land applied was not collected and analyzed prior to land application.

2. The last sludge sampling event, April 2009, did not report any analyses results for CaCO3 Equivalency (%) or Total Organic Carbon (%).

The above items require your immediate attention. Please submit a written response to these findings to Cindy Garner, Water Division Enforcement Branch Manager, 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, and the written response is due by October 28, 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) 389-6970.

Sincerely,

Shan Lynch

Shan Lynch
District 12 Field 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		3	NPDES	11	12	Yr/Mo/Day	17	18	Inspec. Type	19	Inspector	20	Fac. Type
	N		5		ARG0036692			101005			C		S		1

Remarks

67	Inspection Work Days	69	70	Facility Evaluation Rating	71	BI	72	QA	73	74	75	Reserved	80
				3		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 Mena Wastewater Treatment Plant **- on Polk County Road 53, north off of Hwy 8, east of Mena**	**0832 / 10-5-2010**	**July 1, 2006**
	Exit Time/Date **1134 / 10-5-2010**	Permit Expiration Date **June 30, 2011**

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)	Other Facility Data
Jeff Flanigan / Operator / 479 394-1239	
Name, Address of Responsible Official/Title/Phone and Fax Number **Mary Timmons / Mena Water Utilities Manager / (479) 394-2761** **701 Mena St.** **Mena, AR 71953**	Contacted Yes ☐ No ☑
	Major mun.

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

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

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

Sec. B,2,d – The methods for performing the analyses on the Fecal coliform and TSS samples need to be referenced. All other parameters are being referenced on the bench sheets. Also, copies of these methods should be available on site.

Sec. C – Inadequate primary bar screen at the plant influent. Ten States Standards, enforceable standards adopted by the State, state that protection for pumps and other equipment shall be provided by trash racks, coarse bar racks or coarse screens and that the bar spacing between the bars should be no less that one inch. The bar screen at the plant has bar spacing of approximately three inches. This allows excessively large material into the influent pumps.

Sec. D,3 – At the time of the inspection, the automatic sampler was collecting samples based on time. The collected composite samples should be flow weighted.

Sec. F – The Fecal coliform samples are to be in the incubated in the bath at 44.5 degrees Celsius, plus or minus 0.2 degrees. At inspection time, the thermometer showed an incubator temperature of 45.5 degrees Celsius.

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Telephone	Date
Shan Lynch Shan Lynch	**AR Dept. of Environmental Quality / Dist. 12 / (870) 389-6970**	**October 7, 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:	
1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED:__ TYPE OF DEVICE: **weir**	☑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: **4-15-2010**	☑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:	**Data Testing, Inc.**	**American Interplex**
b. LAB ADDRESS:	**3434 Country Club; Ft. Smith, AR 72903**	**8600 Kanis Rd.; Little Rock, AR 72204**
c. PARAMETERS PERFORMED:	**CBOD, NH3-N**	**Biomonitoring**
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	tint green	NA

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: **10-5-2010** Time: **0940**

Head in Inches: **9 1/8 = 9.125** Feet: **0.76**

Type & Size of Primary Flow Measurement Device: **90 degree V-notch weir**

Name & Model of Secondary Flow Measurement Device: **Milltronics HydroRanger**

Date of last Calibration of Secondary Flow Device: **4-15-2010**

Recorded Flow at Date & Time Listed Above: **581 gpm** (Facility Flow Meter)

Calculated Flow at Date & Time Listed Above: **565 gpm**

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

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

$$\% \text{ Error} = \frac{\mathbf{581} - \mathbf{565}}{\mathbf{565}} \times 100$$

$$\% \text{ Error} = \frac{\mathbf{16}}{\mathbf{565}} \times 100$$

% Error = **0.0283** X 100

% Error = **2.83** %

Comments:

DMR Calculation Check

Reporting Period: **From** **10** (Year) **07** (Month) **01** (Day) **To** **10** (Year) **07** (Month) **31** (Day)

Parameter Checked: **NH3-N**

	Loading Mass Mo. Avg. - lbs/day	Concentration Monthly Mo. Avg. - mg/l	Concentration Monthly 7-day Avg. - mg/l
Reported Value:	**3.96**	**0.41**	**0.63**
Calculated Value:	**3.96**	**0.41**	**0.63**
Permit Value:	**55**	**2.1**	**4.5**

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

ADEQ
ARKANSAS
Department of Environmental Quality

December 7, 2010

Mary Timmons, Utilities Manager
City of Mena
701 Mena St.
Mena, AR 71953

Re: NPDES & State Inspections NPDES Permit No.: AR0036692
ARR000145
ARG640043
4426-WG-WR-2

Dear Ms. Timmons:

The Department has received your response to the October 5 & 6, 2010 routine compliance inspections of the above referenced facilities by our District Field Inspector, Shan Lynch. Your letter appears to adequately address the discrepancies identified during the visits. If any further information is deemed necessary you will hear from our permits branch. 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 501-682-0635 or you may e-mail me at anderson@adeq.state.ar.us.

Sincerely,

Alan Anderson

Alan Anderson
Enforcement Analyst
Water Division Enforcement Branch