

April 18, 2011

Mike Hughes General Manager Clarksville Light & Water Company PO Box 1807 Clarksville, AR 72830

AFIN: 36-00038 NPDES Permit No.: AR0022187

Dear Mr. Hughes

On March 16th & 17th, 2011, ADEQ Inspector Amy Beck and I performed 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 did not reveal any violations.

If I can be of any assistance, please contact me at harmont@adeq.state.ar.us or at 479-968-7339 extension 14.

Sincerely,

Travis Harmon

Travis Horman

District 5 Field Inspector

Water Division

cc: Water Division Enforcement Branch

Water Division Permits Branch

⊕	EPA																0	Form A		
	UNITED STATES ENVIRONMENTAL PROTECTION AGENCY Washington, D.C. 20460																			
	NPDES Compliance Inspection Report																			
	Section A: National Data System Coding																			
1 I	Transaction Code NPDES Yr/Mo/Day Inspe											pec. Ty	pe		ector S 20	Fac. Type				
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_	Inspection Work Days]	Facili	ty Evalu	ation F	Rating			BI		QA -]	Reserve	ed			
	67 0 0 69			70 5	J			71	N	72	N 73		74	75						80
	Section B: Facility Data																			
incli Clai	ne and Location of Facility Inspected ade POTW name and NPDES permit resville Light & Water Company	t num		strial use	ers dis	chargin	ig to I	POT	W, als	o	Entry Time/D 3/16/11/ 3/17/11/	0920 0930					Permit Effective Date 4/1/09			
1305	1305 S Crawford, Clarksville, AR 72830 Exit Time/Date 3/16/0920/ 1500 3/17/11/ 1430										Permit Expiration Date 3/31/14									
Gre	Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Gregg Rainey/ Superintendent/ 479-754-7929 Other								er Faci	lity I	Data									
	n Smith/ Lab Supervisor & Pretre ne, Address of Responsible Official/					har					Not in on 3/1	6/11								
Mik	e Hughes/ General Manager	T TUIC/	i iioiiv	c and r az	X I VUIII	.oci					Co	ntacted	l							
PO	Box 1807, Clarksville, AR 72830										Yes	No	$ \checkmark $							
					Sec	ction C	: Are	as E	valua	ted D	uring Inspection	n								
G		G					Mar	ginal	т —	T	isfactory, $N = N$				c I					
S	Permit	S	1	w Meas					S	1 ^	perations & Ma			-	S N	Samp				
S	Records/Reports	N		f-Monit	_	_	ım		S	1	idge Handling/	Dispos	al	F	N	,				
S	Facility Site Review Effluent/Receiving Waters	S	1	mplianc boratory		eautes			S	1	etreatment orm Water			-	N	Multi Other		ıa		
	Emuent/Receiving waters					of Fine	dings	/Con				sheets	if nec	essary		Other	•			
	Section D: Summary of Findings/Comments (Attach additional sheets if necessary) No violations found. Some minor woody vegetation growth on pond levees at 002.																			
	ne(s) and Signature(s) of Inspector(s avis Harmon					Ark	ansa	s De		ment	/Fax t of Environm 7339 x 14 / 47			ty /		Date 3/28/11				
Sig	Signature of Reviewer Agency/Office/Phone and Fax Numbers									Date										

ADEQ Water NPDES Inspection	AFIN: 36-00038	Permit #: AR0022187

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:	Øy □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:	ØS □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:	ØS □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: SSO	Øy □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 Øn □na □ne
15. IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT:	□Y □N ☑NA □NE

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SI	ECTION D: SAMPLING	
PE	ERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS	☑S □M □U □NA □NE
DE	ETAILS:	
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:	Øy □n □na □ne
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 On Ona One
а	. SAMPLES REFRIGERATED DURING COMPOSITING:	Øy On Ona One
b	. PROPER PRESERVATION TECHNIQUES USED:	Øy □n □na □ne
С	CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136:	Øy □N □NA □NE
7.	IF MONITORING IS PERFORMED MORE OFTEN THAN REQUIRED ARE RESULTS REPORTED ON THE DMR:	□Y □N □NA ☑NE
SI	ECTION E: FLOW MEASUREMENT	
	ERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS	⊠s □m □u □na □ne
	TAILS:	
1.	PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: TYPE OF DEVICE: 001 Totalizer	Øy □n □na □ne
2.	calibrated 8/12/10. 002 only primary (90 ° V-notch weir. FLOW MEASURED AT EACH OUTFALL AS REQUIRED:	ØY □N □NA □NE
3.	SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED:	ØY □N □NA □NE
4.	CALIBRATION FREQUENCY ADEQUATE:	✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓
5.	RECORDS MAINTAINED OF CALIBRATION PROCEDURES: CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE: Totalizer calibrated annually.	✓Y □N □NA □NE □Y □N □NA ☑NE
6.		
7.	FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE:	ØY □N □NA □NE
8.	FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES:	ØY □N □NA □NE
9.	HEAD MEASURED AT PROPER LOCATION:	☑Y □N □NA □NE
CI	ECTION F: LABORATORY	
	ERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS	☑S ☐M ☐U ☐NA ☐NE
	ETAILS:	
1.	EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(B) FOR SLUDGES):	ØY □N □NA □NE
2.	IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED:	OY ON ONA MINE
3.	SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT:	ØY □N □NA □NE
4.	QUALITY CONTROL PROCEDURES ADEQUATE:	ØY □N □NA □NE
5.	DUPLICATE SAMPLES ARE ANALYZED ≥10% OF THE TIME:	ØY □N □NA □NE
6. 7.	SPIKED SAMPLES ARE ANALYZED >10% OF THE TIME: COMMERCIAL LABORATORY USED: EEG With samples submitted to American Interplex (Biomonitoring to Huther & Asso	ØY □N □NA □NE
7.	Inc.) All are ADEQ certified.	Clates,
а	. LAB NAME: Environmental Enterprise Group	
b	. LAB ADDRESS: 220 N Knoxville, Russellville, AR 72801	
С	PARAMETERS PERFORMED: FCB, pH	
8.	BIOMONITORING PROCEDURES ADEQUATE:	☑Y □N □NA □NE
а	. PROPER ORGANISMS USED:	☑Y □N □NA □NE
b	. PROPER DILUTION SERIES FOLLOWED:	☑Y □N □NA □NE
	PROPER TEST METHODS AND DURATION:	⊠y □n □na □ne
d	 RETESTS AND/OR TRE PERFORMED AS REQUIRED: <u>001 is approved for semi-annual monitoring</u>. Facility is expected to semi-annual monitoring at 002. Samplers were in place on date of inspection. 	request ☐Y ☐N ☐NA ☑NE

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SECTION	G: EFFLUE	NT/RECEIVIN	IG WATERS	OBSERVATION	ONS						
	N VISUAL OBS					Øs □m □	U DNA DNE				
DETAILS:	001 submerged	d.			 						
OUTFALL #:	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	COLOR	OTHER				
001	None	None	None	None	None	None					
002	None	None	Slight	None	None	Light Green					
	1	1		1	1		1				
SECTION	H: SLUDGE	DISPOSAL									
SLUDGE [DISPOSAL ME	ETS PERMIT F	REQUIREMEN ^T	TS		Øs □m □	U □NA □NE				
DETAILS:					<u> </u>						
1. SLUDGE N	MANAGEMENT ADEQU	ATE TO MAINTAIN EF	FLUENT QUALITY:			⊠s □m	□U □NA □NE				
2. SLUDGE R	RECORDS MAINTAINED	O AS REQUIRED BY 40) CFR 503:			⊠s □m	□U □NA □NE				
3. FOR LAND	APPLIED SLUDGE, T	PE OF LAND APPLIE	TO: (E.G., FOREST,	, AGRICULTURAL, PUE	BLIC CONTACT SITE): A	gricultural					
	II: SAMPLIN										
	RESULTS WITH	HIN PERMIT R	EQUIREMENT	S		□s □m □	U □NA ☑NE				
DETAILS:											
	PRESERVED:						□N □NA ☑NE				
	OPORTIONED SAMPLE						□N □NA ☑NE				
	BTAINED FROM FACIL						□N □NA ☑NE				
	EPRESENTATIVE OF		E OF DISCHARGE:				□N □NA ☑NE				
	PLIT WITH PERMITTE						ON ONA MINE				
	-CUSTODY PROCEDU		ıT.				□N □NA ☑NE				
9. SAMPLES	COLLECTED IN ACCO	RDANCE WITH PERM	II:			Ц	□N □NA ☑NE				
SECTION	I J: STORM V	NATED DOLL	LITION DDE	/ENTION DI	۸NI						
	ATER MANAG					Б І́́ С ПМ П	U DNA DNE				
	No exposure 7/				l l		O DINA DINE				
-	PDATED AS NEEDED:			ations of the ex	posure.	П	□n □na ☑ne				
	INCLUDING ALL DISCH						□N □NA ☑NE				
	N PREVENTION TEAM	IDENTIFIED:					□N □NA ☑NE				
	N PREVENTION TEAM):				□N □NA ☑NE				
5. LIST OF P	OTENTIAL POLLUTANT	Γ SOURCES:					□N □NA ☑NE				
6. LIST OF P	OTENTIAL SOURCES A	AND PAST SPILLS ANI	D LEAKS:				□N □NA ☑NE				
7. ALL NON-S	STORM WATER DISCH	ARGES ARE AUTHOR	IZED:				□N □NA ☑NE				
8. LIST OF S	TRUCTURAL BMPS:						□N □NA ☑NE				
9. LIST OF N	ON-STRUCTURAL BMF	PS:					□N □NA ☑NE				
10. BMPS PRO	OPERLY OPERATED AI	ND MAINTAINED:				□Y	□n □na ☑ne				
11. INSPECTION	ONS CONDUCTED AS	REQUIRED:				□Y	□n □na ☑ne				
-		 		-	-						

DMR Calculation Check

Reporting Period: From 11 2 1 To 11 2 28

Year Month Day Year Month Day

Parameter Checked: CBOD5

	Loading Mass	Concentration Monthly			
	Mo. Avg lbs/day	Mo. Avg mg/l	7-day Avg mg/l		
Reported Value:	29.31	3.85	5.63		
Calculated Value:	29.305	3.845	5.63		
Permit Value:	166.8	10	15		

If calculated value does not equal reported value, explain:

Outfall 001

5.63, 2.00, 3.77, 2.33 mg/l

66.44, 13.39, 24.78, 12.61 lb/day

1.415, 0.803, 0.788, 0.649 MGD,

7.96645 + 1.606 + 2.97076 + 1.51217 = 14.05538

SUM of Flow 3.655 MGD

= 3.8455 mg/l

DMR Calculation Check

Reporting Period: From 11 3 1 To 11 3 31

Year Month Day Year Month Day

Parameter Checked: FCB

	Loading Mass		entration onthly
	Mo. Avg lbs/day	Mo. Avg mg/l	7-day Avg mg/l
Reported Value:		39	593
Calculated Value:	<u> </u>	39	593
Permit Value:	<u> </u>	1,000	2,000

If calculated value does not equal reported value, explain:

Outfall 002

10, 593, 10

1 + 2.773054 + 1 = 4.773054 / 3 = 1.59101

<u>38.9</u>

NPDES Compliance Inspection Report Further Explanation

I inspected on 3/16/11 (DMR, 001 and 002, & No exposure) and 3/17/11 (lab & PCI). ADEQ Inspector Amy Beck attended. We met with Gregg Rainey (Superintendent) and Pam Smith (Pre-treatment Coordinator). We first walked through the process at 001 from influent to effluent. We then traveled to 002 and drove pond levees from influent to effluent. We later returned to 001 to review DMR data from 2010 and 2011. We did not note any DMR exceedances.

We returned on 3/17/11 to inspect the lab. I used a lab checklist to review lab processes and equipment for pH, BOD, and FCB. We then reviewed the facility pretreatment program and records. Later we conducted site visits at two pre-treatment facilities.

No violations were noted during the inspection. There were a few areas of woody vegetation established in the pond levees, which I mentioned to Mr. Rainey as an area of concern. Mr. Rainey reported that they would remove the vegetation as soon as possible. Also, we noted a visible color difference in the receiving stream near the outfall at 002. The effluent at the time of inspection appeared green however I did not see any distinctly visible solids leaving the weir plate. Flow at 002 was approximately 1.616 MGD (ISCO) at the time of observation.

	Water Division NPDES Photographic Evidence Sheet										
Location:	Location: Clarksville Light & Water Company										
Photographe	r:	Travis	Harmon		Witness:	Amy Beck	Amy Beck				
Photo #	1	Of	2		Date:	3/16/11	Time:	1115			
Description:		Some v	woody ve	getation is becoming es	tablished in th	e pond levees.					



Photograph	ner:	Γravis	Harmon	Witness:	Amy Beck		
Photo #	2	Of	2	Date:	3/16/11	Time:	1132

Description:

Near 002 outfall. Darker (greener) water is visible on outfall side of stream. Far bank is opposite side of outfall.

