



ARKANSAS
Department of Environmental Quality

November 22, 2011

Larry Dunaway, Public Works Director
City of Nashville
426 North Main Street
Nashville, AR 71852

AFIN: 31-00036
31-00274

NPDES Permit No.: AR0021776
Permit No.: 4794-WG-WR

Dear Mr. Strawn:

On November 9 and 10, 2011, I performed a routine compliance inspection of the waste water treatment facility, a routine compliance inspection of the land application permit and a pretreatment inspection 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:

Wastewater Treatment Plant

1. The permit requires that progress reports addressing the Ammonia Nitrogen and Selenium be submitted on relatively specific dates in relation to the effective date of the permit. The first progress report was due one year from the effective date, or February 1, 2010. This report was not received until October, 2010 and the second progress report, due February, 2011, has not yet been received.
2. The pH, DO and TRC analyses results that are being reported on the DMR's are process control values taken from the daily operator records. These samples are not collected from the final effluent. Also, these records do not indicate a time, location of sample collection or the individual collecting the samples.
3. A review of the July, 2011, bench sheets showed the CBOD analyses section for the sample collected on the 21st marked as VOID. A result value of zero was entered on the calculations data sheet and this value was used in the calculations for the monthly DMR.
4. Records of DO meter calibrations are not available.
5. A flow meter calibration check revealed an error of 7.75%. This is within the + / - 10% variance range. However, monthly calibration checks have not been done and consequently,

records of these checks are not available. These calibration checks should be performed monthly and records of these checks should be kept.

6. Duplicates of the DO, TRC and Fecal coliform are not being performed as required. Also, prior to the inspection, the last BOD was performed on October 11, 2011 and the last TSS duplicate was performed on September 22, 2011.

* Recommend a 44.5° C temperature specific thermometer for the fecal bath.

*A small amount of foam and a green tint was noted in the wastewater at the chlorine contact chamber.

* It was noted that a few areas of the pond levee on the east bank are beginning to show signs of erosion.

Land Application Permit

The 2010 annual report, due May 30, 2011, has not been submitted to the Department as required. If no land applications have taken place during the calendar year, the report can state such. However, this report should still be submitted annually. This is a repeat violation.

Pretreatment

* Recommend including more detailed information on the inspection reports when doing industry inspections. It appears that some important necessary information is being left off of the inspection reports that would be beneficial in making decisions regarding the pretreatment program.

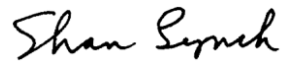
The above items require your immediate attention. Please submit a written response to these findings to the Water Division Enforcement Branch Manager, of this Department. This response should be mailed to the address below, or e-mailed to Water-Enforcement-Report@adeq.state.ar.us. This response should 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 with all necessary documentations (i.e. photos) is due by December 2, 2011.

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

City of Nashville
November 22, 2011
Page 3

If I can be of any assistance, please contact me at (870) 389-6970.

Sincerely,

A handwritten signature in black ink that reads "Shan Lynch". The signature is written in a cursive, flowing style.

Shan Lynch
District Field Inspector
Water Division

cc: Water Division Enforcement Branch
Water Division Permits Branch

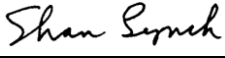
 <p style="text-align: center;">UNITED STATES ENVIRONMENTAL PROTECTION AGENCY Washington, D.C. 20460</p> <h2 style="text-align: center;">NPDES Compliance Inspection Report</h2>	Form Approved OMB No. 2040-0003
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Section A: National Data System Coding																												
Transaction Code			NPDES								Yr/Mo/Day					Inspec. Type		Inspector		Fac. Type								
1	N	2	5	3	A	R	0	0	2	1	7	7	6	11	12	1	1	1	1	0	9	17	18	C	19	S	20	1
Remarks																												
Inspection Work Days				Facility Evaluation Rating				BI		QA		-----Reserved-----																
67				69	70	2	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>) City of Nashville Wastewater Treatment Plant Hwy 27 ~ 1/2 mile south of town	Entry Time/Date 0907 / 11-9-2011	Permit Effective Date February 1, 2009
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) John Harberson / Chief Operator / (870) 845-4522 Ed Carlyle / Pretreatment Coordinator / (870) 845-4522 Name, Address of Responsible Official/Title/Phone and Fax Number Larry Dunaway / Public Works Director / (870) 845-4015 426 North Main Street Nashville, AR 71852	Greg Strawn / Water & Sewer Supt. / (870) 845-7400 Contacted Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Permit Expiration Date January 31, 2014 Other Facility Data Major Municipal 062418

Section C: Areas Evaluated During Inspection							
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)							
M	Permit	M	Flow Measurement	S	Operations & Maintenance	S	Sampling
U	Records/Reports	M	Self-Monitoring Program	N	Sludge Handling/Disposal	N	Pollution Prevention
S	Facility Site Review	M	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)		
* See Further Explanation page		

Name(s) and Signature(s) of Inspector(s) Shan Lynch 	Agency/Office/Telephone ADEQ / Dist. 7 / 870 389-6970	Date November 18, 2011
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:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
6. SAMPLE COLLECTION PROCEDURES ADEQUATE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
a. SAMPLES REFRIGERATED DURING COMPOSITING:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
b. PROPER PRESERVATION TECHNIQUES USED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
c. CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
7. IF MONITORING IS PERFORMED MORE OFTEN THAN REQUIRED ARE RESULTS REPORTED ON THE DMR:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> 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: <u>90 V-notch weir</u>	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
4. CALIBRATION FREQUENCY ADEQUATE: <u>April 13, 2010</u>	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
5. RECORDS MAINTAINED OF CALIBRATION PROCEDURES:	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
6. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE:	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
7. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
8. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
9. HEAD MEASURED AT PROPER LOCATION:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> 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) :	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
4. QUALITY CONTROL PROCEDURES ADEQUATE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
5. DUPLICATE SAMPLES ARE ANALYZED \geq 10% OF THE TIME:	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
6. SPIKED SAMPLES ARE ANALYZED \geq 10% OF THE TIME:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
7. COMMERCIAL LABORATORY USED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
a. LAB NAME: <u>American Interplex</u> <u>Sorrells Research</u> <u>Ana-Lab Corp.</u>	
b. LAB ADDRESS: <u>8600 Kanis Rd.; Little Rock, AR 72204</u> <u>8002 Stanton Rd.; Little Rock, AR 72209</u> <u>PO Box 9000; Kilgore, TX 75663</u>	
c. PARAMETERS PERFORMED: <u>biomonitoring</u> <u>NH3-N, Total Phosphorous, Nitrite + Nitrite N</u> <u>Cyanide, Selenium</u>	
8. BIOMONITORING PROCEDURES ADEQUATE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
a. PROPER ORGANISMS USED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
b. PROPER DILUTION SERIES FOLLOWED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
c. PROPER TEST METHODS AND DURATION:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
d. RETESTS AND/OR TRE PERFORMED AS REQUIRED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> 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

* A small amount of foam and a green tint was noted in the wastewater at the chlorine contact chamber.

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: **11-9-2011** Time: **0954**

Head in Inches: **10.875** Feet: **0.91**

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: **April 13, 2010**

Recorded Flow at Date & Time Listed Above: **955 gpm** (Facility Flow Meter)

Calculated Flow at Date & Time Listed Above: **886.3 gpm**
 (Flow is calculated using flow charts in: ISCO Open Channel Flow Measurement Handbook-5th Edition)

% Error =	Recorded Value	-	Calculated Value	X 100	
	Calculated Value				

% Error =	955	-	886.3	X 100	
	886.3				

% Error =	68.7			X 100	
	886.3				

% Error =	0.0775			X 100	
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% Error =	7.75	%			
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Comments:

DMR Calculation Check

Reporting Period: From 11 07 01 To 11 07 31
Year Month Day Year Month Day

Parameter Checked: TSS

	Loading Mass Mo. Avg. - lbs/day	Concentration Monthly Mo. Avg. - mg/l	7-day Avg. - mg/l
Reported Value:	<u>119.5</u>	<u>16.25</u>	<u>18</u>
Calculated Value:	<u>119.5</u>	<u>16.25</u>	<u>18</u>
Permit Value:	<u>288</u>	<u>15</u>	<u>22.5</u>

If calculated value does not equal reported value, explain:

same

NPDES Compliance Inspection Report Further Explanation

Sec. A – The permit requires that progress reports addressing the Ammonia Nitrogen and Selenium be submitted on relatively specific dates in relation to the effective date of the permit. The first progress report was due one year from the effective date, or February 1, 2010. This report was not received until October, 2010 and the second progress report, due February, 2011, has not yet been received.

Sec. B, 2, a, b, & c – The pH, DO and TRC analyses results that are being reported on the DMR's are process control values taken from the daily operator records. These samples are not collected from the final effluent. Also, these records don't indicate a time, location of sample collection or the individual collecting the samples.

Sec. B, 2, f – A review of the July, 2011, bench sheets showed the CBOD analyses section for the sample collected on the 21st marked as VOID. A result value of zero was entered on the calculations data sheet and this value was used in the calculations for the monthly DMR.

Sec. B, 2, e & B, 3 – Records of DO meter calibrations are not available.

Sec. E, 4, 5 & 6 – A flow meter calibration check revealed an error of 7.75%. This is within the + / - 10% variance range. However, monthly calibration checks have not been done and consequently, records of these checks are not available. These calibration checks should be performed monthly and records of these should be kept.

Sec. F, 5 – Duplicates of the DO, TRC and Fecal coliform are not being performed as required. Also, prior to the inspection the last BOD was performed on October 11, 2011 and the last TSS duplicate was performed on September 22, 2011.

* Recommend a 44.5° C temperature specific thermometer for the fecal bath.

*A small amount of foam and a green tint was noted in the wastewater at the chlorine contact chamber.

* It was noted that a few areas of the pond levee on the east bank are beginning to show signs of erosion.

Larry Dunaway

Public Works Director
City of Nashville
426 N Main St
Nashville, AR 71852
870-845-4015 Office 870-557-1953 Cell 870-845-7409 Fax

November 29, 2011

ADEQ
Shan Lynch
District Field Inspector
5301 Northshore Drive
North Little Rock, AR 72118-5317

Dear Mr. Lynch,

This letter is in response to your inspection letter dated November 22, 2011. The violations will be addressed as follows:

- 1) I have contacted the City Engineer, Jeremy Stone of Civil Engineering Associates, to assist me in compiling the second progress report. The progress report will be submitted to ADEQ as soon as it is available. All future progress reports will be submitted on time.
- 2) Lab personnel have began taking samples where the discharge flows over the weir which is the final effluent. We have reconstructed our lab work sheet to include records of time, location, and the individual collecting the samples. (see enclosure)
- 3) We have contacted ADEQ on this matter. When we receive their input we will find a solution to this problem.
- 4) We have received a new DO meter and records will be kept.
- 5) A new form has been developed for record keeping and monthly checks will be performed.
- 6) We have developed a new worksheet that will be labeled *Duplicate* and will be done every ten sample days. Every ten samples a duplicate will be performed. This new sheet will tell us when a duplicate day is done automatically.

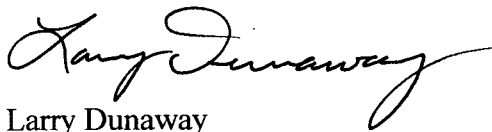
A new thermometer has been ordered for the fecal bath and the pond levee erosion will be addressed in the construction of the new wastewater treatment plant.

The Land Application Permit annual report will be submitted as soon as it is completed for 2010. The report for 2011 will be complete and submitted before May 2012. This report will be done in a timely manner in the future.

A new inspection form is being developed for the Pretreatment Program to include all necessary information. When it is complete it will be submitted to ADEQ for review. This will be done within 30 days.

If any further information is needed or you have any questions please call me at 870-845-4015.

Thank you,

A handwritten signature in cursive script, appearing to read "Larry Dunaway".

Larry Dunaway
Public Works Director
City of Nashville

sp

Enclosures

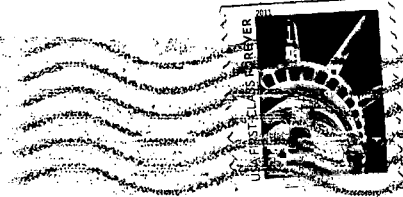
Nashville Public Works

426 North Main Street
Nashville, AR 71852

Address Correction Requested

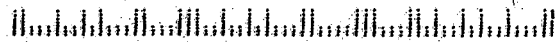
SHREVEPORT LA 711

ED NOV 2011 PM 13 L



ADEQ
Shan Lynch
District Field Inspector
5301 Northshore Drive
North Little Rock, AR 72118-5317

721185317



ADEQ

ARKANSAS
Department of Environmental Quality

December 9, 2011

Larry Dunnaway, Public Works Director
City of Nashville
426 N. Main Street
Nashville, AR 71852

RE: NPDES Permit No.: AR0047813, AFIN: 31-00036, State Permit No. 4794-WG-WR,
AFIN: 31-00274, Response to Inspection

Dear Mr. Dunnaway:

The Department has reviewed the response pertaining to the November 9 and 10, 2011 inspection of the City of Nashville's wastewater treatment facility, land application permit, and Pretreatment by District Field Inspector Shan Lynch. After reviewing the response, the Department has the following comments:

- The inspection report indicated the second Progress Report addressing Ammonia Nitrogen and Selenium was delinquent. However, the report was received at the ADEQ on 05/23/11.
- Please submit to the ADEQ all required reports prior to or upon the date in which they are due.
- Please submit the 2010 Annual Report the ADEQ as soon as it is available, but no later than January 1, 2012. A similar violation was documented during an inspection conducted on November 3 and 4, 2009.

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 facility 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
Enforcement Analyst
Water Division Enforcement Branch