

December 28, 2011

Mike Roberts, Wastewater Utility Manager City of Bentonville 1901 N.E. "A" Street Bentonville, Arkansas 72712

RE: NPDES Permit Compliance Evaluation Inspection

AFIN: 04-00154 NPDES Permit No.: AR0022403

Dear Mr. Roberts:

On December 21, 2011, I performed a routine permit compliance evaluation inspection of the Bentonville wastewater 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 that the facility is operated in compliance with the terms of your permit.

If I can be of any assistance, please contact me at 479-267-0811, ext. 16.

Sincerely,

John Fazio

District 1 Inspector

Water Division

cc: Water Division Enforcement Branch

Water Division Permits Branch

≎ EPA						Form Approved OMB No. 2040-0003		
		ONMENTAL PROTECTIO	N AGEN	CY				
	NPDES Complia							
	-	Section A: Natio			_			
	Fransaction Code NPDE	S			Yr/Mo/Day	Insp	pec. Type Inspector Fac. Type	
1	N 2 5 3 A R 0 0 2 2	4 0 3 11	12	1	1 1 2 2 1 17	18	C 19 S 20 1	
I			Remark	CS				
L	Inspection Work Days Facility Evaluat	on Rating	BI	(QA	I	Reserved	
	67 69 70 5	71	N	72	N 73 74 75		80	
		Section	B: Fac	ility	Data			
incli	e and Location of Facility Inspected (For industrial user de POTW name and NPDES permit number) of Bentonville Wastewater Treatment Plant	discharging to POTV	W, also		Entry Time/Date 1105 / 12-21-11		Permit Effective Date March 1, 2009	
	N.E. "A" Street onville, Arkansas 72712				Exit Time/Date 1350 / 12-21-11		Permit Expiration Date February 28, 2014	
Mik	e(s) of On-Site Representative(s)/Title(s)/Phone and Fax e Roberts, Wastewater Utility Manager, 479-271-3160 s Earl, Operations Foreman, 479-271-3160						er Facility Data ffall 001: 36 23 32.4, -94 12 12.6	
	e, Address of Responsible Official/Title/Phone and Fax	Number					rance: 36 23 27.4, -94 12 14.4	
	e Roberts, Wastewater Utility Manager of Bentonville				Contacted		•	
190 Ben	N.E. "A" Street onville, Arkansas 72712 271-3160, 479-271-3163 (fax)				Yes No No	PD	S #063035	
4//		Section C: Areas E			uring Inspection sfactory, N = Not Evaluated)			
S	Permit S Flow Measur		\mathbf{s}		erations & Maintenance	S	Sampling	
S	Records/Reports S Self-Monitor	ing Program	S	Slu	dge Handling/Disposal	N	Pollution Prevention	
S	Facility Site Review N Compliance	Schedules	N	Pre	treatment	N	Multimedia	
S	Effluent/Receiving Waters S Laboratory		N	Sto	rmwater		Other:	
	Section D: Sumn	ary of Findings/Con	nments	(Att	ach additional sheets if necessary	r)		
Records obtained for review include DMRs and DMR calculating spreadsheets for January - November 2011, and the semi-annual biomonitoring report DMRs. Only one excursion occurred (TSS loading) during this period.								
This inspection revealed that the plant is operated in compliance with the conditions of the permit.								
Since June 2011, approximately 1.5 MGD of wastewater flow has been diverted to the Northwest Arkansas Conservation Authority regional								
wastewater treatment facility.								
Nar	Name(s) and Signature(s) of Inspector(s) Agency/Office/Telephone/Fax AR Dept. of Environmental Quality-Fayetteville						Date	
Joh	Fazio		479-267-0811, ext. 16; 479-267-0819 (fax)				December 22, 2011	
Sign	Signature of Reviewer Agency/Office/Phone and Fax Numbers Date							

ADEQ Water NPDES Inspection	AFIN: 04-00154	Permit #: AR0022403

SECTION A: PERMIT VERIFICATION	
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS	☑S □M □U □NA □NE
DETAILS:	
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:	Øs □m □u □na □ne
2. TREATMENT UNITS PROPERLY MAINTAINED:	☑S ☐M ☐U ☐NA ☐NE
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED: <u>City has provided dual feed for power; recently obtained back-up generator for UV disinfection system.</u>	☑S ☐M ☐U ☐NA ☐NE
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE: SCADA – battery backup	⊠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/ <u>OVERFLOWS</u> OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR: <u>Overflow</u> collection system only.	wsin
12. IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED:	☑Y □N □NA □NE
13. HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS: Bypasses: N/A; Overflows:	Yes ☑Y ☐N ☐NA ☐NE
14. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT: <u>During heavy rains in spring 2011.</u>	☑Y □N □NA □NE
15. IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT: One TSS loading excursion.	Øy □n □na □ne

ADEQ Water NPDES Inspection	AFIN: 04-00154	Permit #: AR0022403

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, RESULTS ARE 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: ISCO 3010 I	Ultrasonic
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: Calibrated 03/14/11	Øy □n □na □ne
5. RECORDS MAINTAINED OF CALIBRATION PROCEDURES:	Øy □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: Post aeration tu time of flow/head measurement to prevent turbulence through flume.	rned off at ☑Y □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
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: 1) American Interplex 2) Huther & Associates, Inc.	
b. LAB ADDRESS: 8600 Kanis Rd., Little Rock, Arkansas 72204 1156 N. Bonnie Brae, Denton, TX 7620	<u>11</u>
c. PARAMETERS PERFORMED: Table II Organics, Table III Metals, TCLP, PCB 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: (duration reviewed)	☑Y □N □NA □NE
d. RETESTS AND/OR TRE PERFORMED AS REQUIRED:	□y □n □na ☑ne

ADEQ Water NPDES Inspection	AFIN: 04-00154	Permit #: AR0022403

SECTION G: EFFLUENT/RECEIVING WATERS OBSERVATIONS								
						М ѕ Пм Г	JU □NA □NE	
DETAILS:								
OUTFALL #:	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	COLOR	OTHER	
001	None	None	None	None	None	Clear		
			I	1	1	1		
SECTION	H: SLUDGE	DISPOSAL						
SLUDGE D	DISPOSAL ME	ETS PERMIT F	REQUIREMEN [®]	TS		⊠s □m □]U □NA □NE	
DETAILS:	1) Class B Land	Applied in Kar	nsas; 2) City co	mposting facili	ty; 3) Tontitown,	AR Landfill		
1. SLUDGE M	IANAGEMENT ADEQU	ATE TO MAINTAIN EF	FLUENT QUALITY:			Øs □n	M □U □NA □NE	
2. SLUDGE R	ECORDS MAINTAINED	AS REQUIRED BY 40	O CFR 503:			Øs □n	II □U □NA □NE	
3. FOR LAND	APPLIED SLUDGE, TY	PE OF LAND APPLIE	D TO: (E.G., FOREST	, AGRICULTURAL, PUI	BLIC CONTACT SITE):	Agricultural		
SECTION	I: SAMPLIN	G INSPECTION	ON PROCEDI	URES				
	RESULTS WITH	HIN PERMIT R	EQUIREMENT	S		□s □m □	JU □NA ☑NE	
DETAILS:								
	OBTAINED THIS INSPI					<u></u>	Y □N □NA ☑NE	
2. TYPE OF S	2. TYPE OF SAMPLE: ☐GRAB:_ ☐COMPOSITE:_ METHOD:_ FREQUENCY:							
3. SAMPLES PRESERVED:							Y □N □NA ☑NE	
4. FLOW PRO		Y □N □NA ☑NE						
5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE:							Y □N □NA ☑NE	
6. SAMPLE R	EPRESENTATIVE OF	OLUME AND NATUR	E OF DISCHARGE:				Y □N □NA ☑NE	
7. SAMPLE SPLIT WITH PERMITTEE:							Y ON ONA MINE	
8. CHAIN-OF-	CUSTODY PROCEDU	RES EMPLOYED:					Y ON ONA MINE	
9. SAMPLES	COLLECTED IN ACCO	RDANCE WITH PERM	IT:			<u>D</u> `	Y □N □NA ☑NE	
0=0=101		//		/=\\=\a\\ =\				
	J: STORMW				<u> </u>			
	ATER MANAGI						JU ØNA □NE	
	(Have No Expo			in separate ins	pection)		. D. B. D.	
1. SWPPP UPDATED AS NEEDED: DATE OF LAST UPDATE:							Y ON MA ONE	
2. SITE MAP INCLUDING ALL DISCHARGES AND SURFACE WATERS:							Y ON MA ONE	
3. POLLUTION PREVENTION TEAM IDENTIFIED:							Y ON MA ONE	
		Y ON MA ONE						
6. LIST OF PO		Y ON MA ONE						
7. ALL NON-S	<u> </u>	Y ON MA ONE						
8. LIST OF STRUCTURAL BMPS: 9. LIST OF NON-STRUCTURAL BMPS:							Y ON MA ONE	
							Y □N ØNA □NE Y □N ØNA □NE	
10. BMPS PROPERLY OPERATED AND MAINTAINED: 11. INSPECTIONS CONDUCTED AS PEOLIBED:								
II. INSPECTIO	11. INSPECTIONS CONDUCTED AS REQUIRED:							

FLOW CALCULATION SHEET							
Date: 12/21/11 Time: 1325							
Head in Inches: 11.25 Feet: 0.94							
Type & Size	e of Primary Flow	Measurement Device	e: 24" Parshall Flume				
Name & Mo	odel of Secondary	Flow Measurement	Device: ISCO 3010 L	Iltrasonic			
Date of last Calibration of Secondary Flow Device: 03/14/11 Recorded Flow at Date & Time Listed Above: 3069 gpm (Facility Flow Meter)							
	Flow at Date & Tired using flow charts in:		3262 gpm easurement Handbook-5 th Edition	on)			
% Error =	Recorded Value Calcu	- Calculated Valulated Valulated Value	x 100				
% Error =	3069	- 3262 3262	X 100				
% Error =	-193 3262	X 100					
% Error =	-0.059	X 100					
% Error =	-5.9	%					
Comments: Deviation less than +/- 10%							

DMR Calculation Check

Reporting Period: From 11 06 01 To 11 06 30 Year Month Day Year Month Day

Parameter Checked: TP

	Loading Mass	Concentration Monthly		
	Mo. Avg lbs/day	Mo. Avg mg/l	7-day Avg mg/l	
Reported Value:	10.5	0.3	0.5	
Calculated Value:	10.5	0.3	0.5	
Permit Value:	33.4	1	1.5	

If calculated value does not equal reported value, explain: