



ARKANSAS
Department of Environmental Quality

October 23, 2012

Mr. J.R. Henderson, Water and Waste Water Superintendent
City of Mountain View
P.O. Box 360
Mountain View, AR 72560

RE: Discharge of sludge from the Waste Water Treatment Plant
AFIN: 69-00011, NPDES Permit No.: AR0020117

Dear Mr. Henderson:

On October 15, 2012, I performed a reconnaissance inspection of the Mountain View Waste Water Treatment Plant in accordance with the provisions of the Federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, and the regulations promulgated thereunder. The inspection revealed the following violations:

1. Part I, Section A of the permit states there should be no discharge of distinctly visible solids, scum, or foam of a persistent nature, nor shall there be any formation of slime, bottom deposits, or sludge banks. During the site inspection sludge banks were observed in the receiving stream. This material is making it through the treatment system and being discharged to the receiving stream in violation of Part I, Section A of the permit, and Ark. Code Ann. § 8-4-217(a)(2) which states, "It shall be unlawful for any person to place or cause to be placed any sewage, industrial waste, or other wastes in a location where it is likely to cause pollution of any waters of the state."
2. You have failed to properly operate and maintain the treatment system in violation of Part III, Section B.1.a of the permit.
3. The discharge of untreated or partially treated waste water to the receiving stream was not reported to the Department as required by Part III, Section D.6 of the permit.

The above items require your immediate attention. You must immediately cease the discharge of partially treated wastewater to Hughes Creek. Furthermore, you must submit a written response to the above findings to the attention of the Water Division Inspection Branch of ADEQ at the address listed on this letter head. This written response should contain detailed documentation describing the course of action taken to correct the violations noted. This corrective action should be completed as soon as possible, and the written response shall be submitted to the Department by **November 6, 2012**.

Mr. J.R. Henderson, Mountain View Water and Waste Water
October 23, 2012
Page 2

If you have any questions or would like to discuss any aspect of this inspection or the required written response in greater detail, please contact me at 870-446-2770 or by e-mail at morris@adeq.state.ar.us .

Sincerely,

A handwritten signature in black ink that reads "Tony L. Morris". The signature is written in a cursive style with a horizontal line above the first few letters.

Tony L. Morris
District #2 Field Inspector
ADEQ Water Division

cc: Sean Saunders, ADEQ Water Division District 11 Field Inspector
Water Division Permits Branch



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

Transaction Code	NPDES	Yr/Mo/Day	Inspec. Type	Inspector	Fac. Type
1 N 2 5 3 A R 0 0 2 0 1 1 7 1 1 1 0 1 5 1 2 1 1 R 1 S 20 1					

Remarks

6 9 - 0 0 0 1 1

Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved
6	7 N	7 N	7 N	7 7

6 6 7 N 7 N 7 7 8

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number)
City of Mountain View Waste Water Utility, the Hwy 66 West Lift Station is located on the south side of Hwy 66 west of town adjacent to the P.D Building Supply

Entry Time/Date
09:50 October 15, 2012

Permit Effective Date
August 1, 2008

Exit Time/Date
11:50 October 15, 2012

Permit Expiration Date
July 31, 2013

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)
Jackie Craig, Waste Water Utility 870-269-8284 (Waste Water Treatment Plant)

Other Facility Data

Lat. 35.8626
Long. -92.1464

Name, Address of Responsible Official/Title/Phone and Fax Number
**Mr. J.R. Henderson, Water and Waste Water Director
City of Mountain View
P.O. Drawer 360
Mountain View, AR 72560 Phone: 870-269-3293**

Contacted
Yes No

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

S	Permit	S	Flow Measurement	S	Operations & Maintenance	N	Sampling
N	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	N	Laboratory	N	Storm Water	N	Other:

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

- This site visit was the result of a citizen complaint concerning sludge in Hughes Creek.
- The complaint was found to be valid.
- There are operational problems at the treatment plant. Large volumes of sludge are being discharged to the receiving stream.
- The discharge of distinctly visible solids and the formation of bottom deposits and sludge banks is a violation of the permit.

Name(s) and Signature(s) of Inspector(s)
Tony L. Morris

Agency/Office/Telephone/Fax
**AR Dept. of Environmental Quality-Jasper Field Office
870-446-2770 (Office) / 501-837-6978 (Cell)**

Date
October 16, 2012

Signature of Reviewer

Agency/Office/Phone and Fax Numbers

Date

Water Division NPDES Photographic Evidence Sheet

Location: _____

Photographer: Tony Morris **Witness:** Sean Saunders

Photo # 1 **Of** 4 **Date:** 10/15/12 **Time:** 10:03

Description: Activated sludge in a pool within Hughes Creek.



Photographer: Tony Morris **Witness:** Sean Saunders

Photo # 2 **Of** 4 **Date:** 10/15/12 **Time:** 10:09

Description: Sludge coating the stream bed of Hughes Creek below the Mountain View POTW.



Water Division NPDES Photographic Evidence Sheet

Location:							
Photographer: Tony Morris				Witness: Sean Saunders			
Photo #	3	Of	4	Date:	10/15/12	Time:	10:36
Description: The final clarifier with floating, unsettled sludge on the surface.							



Photographer: Tony Morris				Witness: Sean Saunders			
Photo #	4	Of	4	Date:	10/15/12	Time:	10:39
Description: Recently spilled sludge within the plant with drying beds visible in the background.							



311 W. Main Street
Drawer 360
Mountain View, AR 72560
Office: 870-269-3293
Fax: 870-269-9158

**Mountain View
Water & Sewer
Department**

Fax

A DEQ Water Division

To: *Tony Morris* From: *JR Henderson*

Fax: *501-682-0880* Pages: *4*

Phone: _____ Date: *11-6-2012*

Re: *Inspection Branch*

- Urgent For Review Please Comment Please Reply For Your Info

• **Comments:**

Original in mail.

The information in this transmission is confidential and/or legally privileged. It is intended for the use of the individual or entity named above. If you are not the intended recipient, be aware that any disclosure, copying, distribution, or use of this information is strictly prohibited. If you have received this fax in error, please delete from your system without copying or forwarding it and notify us by phone or return.

Mountain View Water & Wastewater

PO BOX 360
100 Oak Ave.
MOUNTAIN VIEW AR 72560

PHONE: 870-269-3293
FAX: 870-269-9158

November 6, 2012

Mr. Tony Morris
District #2 Field Inspector
AEQ Water Division
P.O. Box 532
Jasper, AR 72641

Re: Discharge of sludge from Waste Water Treatment Plant
AFIN: 69-00011, NPDES Permit No. AR0020117

Dear Mr. Morris,

In response to your October 23, 2012 letter concerning a reconnaissance inspection of the Mountain View Waste Water Treatment Plant in which wastewater sludge was found on the banks of Hughes Creek and within the Treatment Plant grounds.

Agreed, that any solids discharge is unacceptable from the Treatment Plant discharge outfall or from the Treatment Plant site. From our field inspection on October 31, we did find fine pin floc coming over the weirs and unsettled sludge floating on top of the clarifier.

The sludge shown in your pictures within the Plant grounds was at the Clarifier manhole from the oxidation ditch and the sludge came from a large hydraulic rainfall event that caused the floating sludge to spill out of the manhole during the rain event.

The following steps in our Plan of Action are to be immediately implemented and addressed to correct any in Plant problems and to stop any future possible solids discharge.

1. Get the Activated Sludge Plant back to operating normally by December 1st
 - a. This includes restoring a proper sludge age and F/M ratio to get the sludge back to settling properly in clarifier.
 - b. Begin a systematic wasting schedule to be followed based on the amount of incoming flow and the biomass health and amount of solids in the oxidation ditch. See attached WAS rate.
 - c. Review of grease traps and required Pretreatment Ordinances to protect the Plant from the grease that is interfering with drying bed operations.
 - d. Additional sampling to determine Influent BOD, TSS loading, MLSS concentrations, RAS concentrations and WAS concentrations.
2. Additional training for the operators by January 1st, on how to handle large hydraulic wet weather influxes to retain the solids with in the Treatment Plant's Oxidation Ditch, Clarifier and Digester.

3. Additional training by February 1st, from oxidation ditch supplier and/or Consulting Engineer on Treatment Plant Operations for determining Return Activated Sludge rates and Waste Activated wasting rates for better in Plant solids control.

Please review and contact our office if the Plan of Action meets with your approval.

Sincerely,



J.R. Henderson,
Water and Waste Water Superintendent
City Of Mountain View
P.O. Box 360
Mountain View, AR 72560



P.O. Box 34087 • Little Rock, Arkansas 72203-4087
 501-371-0272 • FAX 501-371-9932

Job No. _____ Sheet _____ / _____

Project _____

Prepared By BT Date: 11/5/12

Checked By _____ Date: _____

Estimate WAS RATE
 Mountain View WTP

Assumptions:

Incoming BOD = 200 mg/L
 Effluent BOD = 5 mg/L
 Sludge yield = .85 lb SS / lb BOD Removed
 0.8% Solids in clarifier
 Flowrate = 0.2 MGD

$200 \text{ mg/L} - 5 \text{ mg/L} = 195 \text{ mg/L BOD Removed}$

$195 \frac{\text{mg}}{\text{L}} (.2 \text{ MGD}) (8.34 \frac{\text{lb}}{\text{gal}}) = 325.3 \text{ lb BOD removed}$

$.85 \frac{\text{lb SS}}{\text{lb BOD Removed}} \times 325.3 = 276.5 \text{ lb Solids}$

$\frac{276.5}{.008} = 34,563 \text{ lb Sludge}$

$\frac{34,563}{8.34 \frac{\text{lb}}{\text{gal}}} = 4144 \text{ gal Sludge / day}$
 $= 173 \text{ gal / hour}$

- ∴ @ plant flow = 200,000 gal/day, WAS = 173 gal/hr
- = 300,000 gal/day, WAS = 260 gal/hr
- 400,000 gal/day, WAS = 346 gal/hr
- 500,000 gal/day, WAS = 433 gal/hr
- 600,000 gal/day, WAS = 519 gal/hr
- 700,000 gal/day, WAS = 605 gal/hr

Mountain View Water & Wastewater

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100 Oak Ave.
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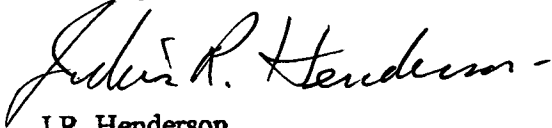
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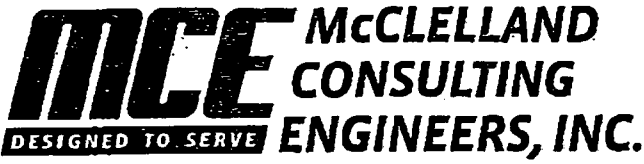
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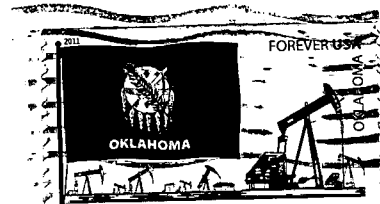
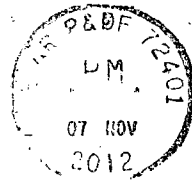
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CITY OF MOUNTAIN VIEW
WATER & SEWER DEPT.
Drawer 360 PH.269-3293
Mountain View, AR 72560



ADEQ
WATER INSPECTION BRANCH
5301 NORTSHORE DRIVE
NORTH LITTLE ROCK, AR 72118-5317

721185317 R015



ADEQ

ARKANSAS
Department of Environmental Quality

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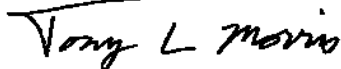
Dear Mr. Henderson:

I am writing in reply to your recent correspondence regarding the Mountain View Waste Water Treatment Plant operation. Your letter was in response to an October 15, 2012 complaint investigation of Hughes Creek and associated NPDES Reconnaissance Inspection of the treatment plant.

Your letter listed specific actions and target dates for accomplishing the goal of returning the plant to acceptable operating conditions. The target date of December 1, 2012 is accepted for addressing plant operation and sludge management issues which were listed in your letter. In order to prevent future problems additional operator training in activated sludge treatment process will be done. The target date for the additional training, to be completed by February 1, 2013, is accepted. Please notify me in writing when each of these tasks is completed.

I appreciate your prompt response to this matter. Your actions thus far reflect well on the City of Mountain View and the Water and Waste Water Department. If you have any questions or would like to discuss any aspect of this letter, please contact me at 870-446-2770 or by e-mail at morris@adeq.state.ar.us.

Sincerely,



Tony L. Morris
District #2 Field Inspector
ADEQ Water Division

cc: Sean Saunders, ADEQ Water Division District 11 Field Inspector
Water Division Enforcement Branch