

November 26, 2012

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

RE: NPDES Permit Compliance Sampling Inspection Stormwater – No Exposure Exclusion Inspection AFIN 04-00154

Dear Mr. Roberts:

On October 23rd and November 1st, 2012, I performed a routine compliance sampling inspection and an industrial stormwater general permit compliance inspection at the Bentonville wastewater treatment facility. These inspections were conducted 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 inspections revealed the following:

Compliance Sampling Inspection: NPDES Permit No.: AR0022403

At the time of the inspection, it appeared that your facility was being operated in accordance with the terms of your permit. The ADEQ split effluent samples with the City of Bentonville. The analytical results are provided on Page 8 of this report.

No Exposure Exclusion: NPDES Permit No.: ARR00C404

The renewal certification for "No Exposure Exclusion" under the Industrial Stormwater General Permit ARR000000 was approved by the Department on August 23, 2010. At the time of the inspection, it appeared that the conditions necessary for the exclusion had been met.

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

Sincerely,

John Fazio District 1 Inspector Water Division

												Form Approved OMB No. 2040-0003
⇒ EPA									ONIB No. 2040-0003			
		UNIT	ED STAT					ECTIO	N AGE	NCY		
	NPDES Compliance Inspection Report											
					S	ection	n A: 1	Natio	nal D	ata S	System Coding	
1	Transaction Code							nspec. Type Inspector Fac. Type 19 S 20 1				
Remarks												
ACHIGIAS												
Inspection Work Days Facility Evaluation Rating BI QA									Reserved			
	67 69		70	5				71	N	72	N 73 74 75	80
							Sec	tion	B: Fa	cility	Data	
Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) City of Bentonville Wastewater Treatment Plant Entry Time/Date 1030 / 11-01-12 0905 / 10-23-12								Permit Effective Date March 1, 2009				
	l N.E. "A" Street tonville, Arkansas 72712										Exit Time/Date 1340 / 11-01-12 0935 / 10/23/12	Permit Expiration Date February 28, 2014
Mil Nar	Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Mike Roberts, Wastewater Utility Manager, 479-271-3160, 479-271-3167 (fax) Nancy Busen, Lab Supervisor and Pretreatment Coordinator, 479-271-3160 Outfall 001: 36 231 32.4", -94 12' 12.6"											
	Dustin Kahrl, Operator, 479-271-3160 Name, Address of Responsible Official/Title/Phone and Fax Number Entrance: 36 23' 27.4", -94 12' 14.4"											
	Mike Roberts, Wastewater Utility Manager City of Bentonville City of Bentonville											
1901 N.E. "A" Street Bentonville, Arkansas 72712												
479-271-3160, 479-271-3163 (fax)												
Section C: Areas Evaluated During Inspection $(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)$												
S	Permit	S	Flow	Measu	remen	ıt			S	Op	perations & Maintenance S	Sampling
S	Records/Reports	S	Self-N	Aonito	ring P	rogra	ım		S	Staage Handing Disposal		Pollution Prevention
S	Facility Site Review N Compliance Schedules N P			Pre	retreatment	Multimedia						
S	S Effluent/Receiving Waters S Laboratory N				Stormwater ts (Attach additional sheets if necessary)		Other:					
Section D: Summary of Findings/Comments (Attach additional sheets if necessary)												
Records obtained for later review include DMRs and DMR calculating spreadsheets for January - October 2012, the semi-annual chronic biomonitoring report DMRs, and the March 2012 chronic biomonitoring report. No excursions occurred during this period.												
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Naı	ne(s) and Signature(s) of Inspector(s	s)							/Telep			Date
John Fazio										ntal Quality-Fayetteville 79-267-0819 (fax)	November 20, 2012	
Signature of Reviewer					Agency/Office/Phone and Fax Numbers				e and	Date		

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

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:	Øs □m □u □na □ne
2. TREATMENT UNITS PROPERLY MAINTAINED:	ØS □M □U □NA □NE
 STANDBY POWER OR OTHER EQUIVALENT PROVIDED: <u>City has provided dual feed for power; have back-up generator for disinfection system.</u> 	·UV ☑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: <u>Upgrading manuals to electronic format</u>	☑y □n □na □ne
9. STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED:	☑Y □N □NA □NE
10. PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED: EQ Basin at lift station	☑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:	□Y ☑N □NA □NE
15. IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT:	□Y □N ØNA □NE

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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:	Øy □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:	Øy □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: Y TYPE OF DEVICE: ISCO 3010	Ultrasonic 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: Calibrated 01/11/12	☑Y □N □NA □NE
5. RECORDS MAINTAINED OF CALIBRATION PROCEDURES:	MY ON ONA ONE
6. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE:	MY ON ONA ONE
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.	
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: 100% of the time	☑Y □N □NA □NE
6. SPIKED SAMPLES ARE ANALYZED ≥10% OF THE TIME: 100% of the time	☑Y □N □NA □NE
7. COMMERCIAL LABORATORY USED:	Øy □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 762	<u>01</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:	MY ON ONA ONE
d. RETESTS AND/OR TRE PERFORMED AS REQUIRED:	□Y □N ☑NA □NE

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BASED ON VISUAL OBSERVATIONS ONLY DETAILS: OUTFAIL #: OIL SHEEN GREASE TURBIDITY VISIBLE FOAM FLOATING SOLIDS COLOR OTHER O01 None None None None None Clear SECTION H: SLUDGE DISPOSAL SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS SIMILUMA INE DETAILS: 1) Class B Land Applied in Kansas: 2) City composting facility 1. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503: 3. FOR LAND APPLIED SLUDGE, TYPE OF LAND APPLIED TO: (E.G., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE); AGRICULTURAL SECTION I: SAMPLENG INSPECTION PROCEDURES SAMPLE RESULTS WITHIN PERMIT REQUIREMENTS DETAILS: 1. SAMPLES OBTAINED THIS INSPECTION: 2. SLUDGE RESULTS WITHIN PERMIT REQUIREMENTS DETAILS: 3. SAMPLES PRESERVED: 4. FLOW PROPORTIONED SAMPLES OBTAINED: 5. SAMPLE OBTAINED FROM FACILITY'S SAMPLIND DEVICE: 6. SAMPLE REPRESENTATIVE OF VOLUME AND NATURE OF DISCHARGE: 2. SLAMPLE PERMIT SAMPLING INSPECTION: 3. SAMPLE REPRESENTATIVE OF VOLUME AND NATURE OF DISCHARGE: 2. SLAMPLE PERMITERES. 2. SLAMPLE PERMITERES. 2. SLAMPLE PRESENTATIVE OF VOLUME AND NATURE OF DISCHARGE: 2. SLAMPLE SPLIT WITH PERMITTEE: 3. SAMPLE SPLIT WITH PERMIT SPLIT PROPERTY SA								
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1. SAMPLES OBTAINED THIS INSPECTION: 2. TYPE OF SAMPLE: GRAB: COMPOSITE: METHOD: FREQUENCY: 3. SAMPLES PRESERVED:								
2. TYPE OF SAMPLE: GRAB: COMPOSITE: METHOD: FREQUENCY: 3. SAMPLES PRESERVED:								
3. SAMPLES PRESERVED: 4. FLOW PROPORTIONED SAMPLES OBTAINED: 5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE: 6. SAMPLE REPRESENTATIVE OF VOLUME AND NATURE OF DISCHARGE: 7. SAMPLE SPLIT WITH PERMITTEE:								
4. FLOW PROPORTIONED SAMPLES OBTAINED: 5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE: 6. SAMPLE REPRESENTATIVE OF VOLUME AND NATURE OF DISCHARGE: 7. SAMPLE SPLIT WITH PERMITTEE: 1. SAMPLE SPLIT WITH PERMITTEE: 1. SAMPLE SPLIT WITH PERMITTEE:								
5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE: 6. SAMPLE REPRESENTATIVE OF VOLUME AND NATURE OF DISCHARGE: 7. SAMPLE SPLIT WITH PERMITTEE:								
6. SAMPLE REPRESENTATIVE OF VOLUME AND NATURE OF DISCHARGE: 7. SAMPLE SPLIT WITH PERMITTEE: 1. SAMPLE SPLIT WITH PERMITTEE: 1. SAMPLE SPLIT WITH PERMITTEE:								
7. SAMPLE SPLIT WITH PERMITTEE:								
8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED:								
SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT:								
SECTION J: STORMWATER POLLUTION PREVENTION PLAN								
STORMWATER MANAGEMENT MEETS PERMIT REQUIREMENTS S IM IU IN NE								
DETAILS: (Have No Exposure Certification –addressed in separate inspection)								
1. SWPPP UPDATED AS NEEDED: DATE OF LAST UPDATE:								
2. SITE MAP INCLUDING ALL DISCHARGES AND SURFACE WATERS:								
POLLUTION PREVENTION TEAM IDENTIFIED:								
POLLUTION PREVENTION TEAM PROPERLY TRAINED:								
LIST OF POTENTIAL POLLUTANT SOURCES:								
S. LIST OF POTENTIAL SOURCES AND PAST SPILLS AND LEAKS:								
7. ALL NON-STORMWATER DISCHARGES ARE AUTHORIZED:								
8. LIST OF STRUCTURAL BMPS:								
9. LIST OF NON-STRUCTURAL BMPS:								
10. BMPS PROPERLY OPERATED AND MAINTAINED:								
11. INSPECTIONS CONDUCTED AS REQUIRED:								

FLOW CALCULATION SHEET							
Date: 11/01/12 Time: 1145							
Head in Inches: 8 Feet: 0.67							
Type & Size of Primary Flow Measurement Device: 24" Parshall Flume							
Name & Mo	odel of Secondary	/ Flow Measuremen	Device: ISCO 3	010 Ultrasonic			
Date of last	Calibration of Se	condary Flow Devic	e· 01/11/12				
				(Facility Flag Marca)			
Recorded Flow at Date & Time Listed Above: 2046 gpm (Facility Flow Meter)							
Calculated Flow at Date & Time Listed Above: 1930 gpm (Flow is calculated using flow charts in: ISCO Open Channel Flow Measurement Handbook-5 th Edition)							
% Error =	Recorded Value	e - Calculated Va	alue X 100				
70 E1101 =	Calc	ulated Value	7 100				
% Error =	2046	- 1930 1930	X 100				
% Error =	116 1930	X 100					
% Error =	0.06	X 100					
% Error = 6.0 %							
Comments: Deviation less than +/- 10%							

DMR Calculation Check

Reporting Period: From 12 03 01 To 12 03 31

Year Month Day Year Month Day

Parameter Checked: NH3-N

	Loading Mass	Concentration Monthly		
	Mo. Avg lbs/day	Mo. Avg mg/l	7-day Avg mg/l	
Reported Value:	2.9	0.1	0.1	
Calculated Value:	2.9	0.1	0.1	
Permit Value:	136.8	4.1	7.5	

If calculated value does not equal reported value, explain:

Compliance Sampling Inspection Results

Parameters	ADEQ	Bentonville WWTP
CBOD5	1.65 mg/L	3.3 mg/L
TSS	3.3 mg/L	3.2 mg/L
NH3-N	0.086 mg/L	0.1 mg/L
DO	8.33 mg/L	7.95 mg/L
FCB	~17 / 100 ml	5 / 100 ml
TP	0.239 mg/L	0.3 mg/L
NO2 & NO3	2.08 mg/L	2.3 mg/L
pН	7.52 S.U.	7.91 S.U.
Temperature	21.0 ° C	21.8° C
Flow		2.82 MGD