

April 8, 2013

The Honorable Allen Maxwell, Mayor City of Monitcello-East Plant and West Plant P.O. Box 505 Monticello, AR 71655

## RE: Compliance Inspections (Drew Co) AFIN: 22-00037 NPDES Permit No.: AR0021831 (EAST) AR0021822 (WEST)

Dear Mayor Maxwell:

On March 25, 2013, I performed routine compliance inspections of the City of Monitcello-East Plant and the Monticello-West 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. These inspections revealed the following violations:

# AR0021831 East Plant

- 1. The facility did not have any records for quarterly copper samples for the third and fourth quarters 2012. This is a violation of Part I of the permit.
- 2. The curtain in the first pond at the East Plant was under water and needed adjustment (see photos 1 and 2). This is a violation of Part III.B.1.A of the permit.

# **Both Plants**

3. The chain of custodies for both plants did not indicate the phosphorus or nitratenitrite were taken, or properly preserved with acid and ice. This is a violation of Part III.C.3 of both permits.

The above items require your immediate attention. Please submit a written response to these findings to the Water Division Inspection Branch of this Department. This response should be mailed to the address at the bottom of the first page of the letter or e-mailed to <u>Water-Inspection-report@adeq.state.ar.us</u>. This response should contain documentation describing the course of action taken to correct each item noted. This corrective action

Page 2

should be completed as soon as possible, and the written response with all necessary documentation (i.e. photos) is due by **April 22, 2013.** 

If I can be of any assistance, please contact me at 870-862-0680.

Sincerely,

John W. Lumf

John W. Lamb District 8 Field Inspector Water Division

AFIN: 22-00037

÷	€EPA										Form Approved OMB No. 2040-0003						
		UNIT	ED STATES ENVIRONM		N AGEN	NCY											
	Washington, D.C. 20460 NPDES Compliance Inspection Report																
	Section A: National Data System Coding																
,	Transaction Code		NPDES					/Mo/Da	ay			Ins	bec. Typ	e In	spector	Fac	c. Type
1	N 2 5 3 A R 0 0 2 1 8 3 1 11 12 1						<b>3 0 3 2 5</b> 17 18			18	С	19	S	20 1	1		
Remarks										I							
_	Inspection Work Days	I	Facility Evaluation R	ating I	BI	(	QA					]	Reserved	<u>-</u>			
	67 69		70 2	71	N	72	<b>N</b> 73			74	75					80	0
				Section H		ž											
	e and Location of Facility Inspected ade POTW name and NPDES permit			harging to POTW	V, also	)	Entry Tim 12:49 /3/						Permit	Effectiv	e Date		
City	of Monitcello-East Plant												7/1/20	12			
	Old Florence Road aticello, AR						Exit Time 15:42 /3		013			Permit Expiration Date 6/30/2017					
	Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Ot								Other Facility Data Major Municipal								
Name, Address of Responsible Official/Title/Phone and Fax Number Allen Maxwell, Mayor, 870-367-3415 City of Monitcello-East Plant P.O. Box 505 Monticello, AR 71655							Contacted Yes No										
	Section C: Areas Evaluated During Inspection (S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)																
S	Permit	S	Flow Measuremen	nt	U	Op	perations & Maintenance			U Sampling							
U	Records/Reports	U	Self-Monitoring H	rogram	S	Slu	ludge Handling/Disposal				N Pollution Prevention						
М	Facility Site Review	Ν	Compliance Sche	dules	Ν	Pre	retreatment				N Multimedia						
S	Effluent/Receiving Waters	S	Laboratory		Ν	Sto	torm Water					Other:					
		Se	ction D: Summary	of Findings/Com	ment	s (Att	ach additio	onal sh	neets i	f nece	ssary	)					
Section B.2 and Section D.4: The facility did not have any records for quarterly copper samples for the third and fourth quarters 2012. Section C.1 and 2: The curtain in the first pond at the East Plant was under water and needed adjustment. See photos 1 & 2. Section D.6: The chain of custodies did not indicate the phosphorus or nitrate-nitrite were taken, or properly preserved with acid and ice.																	
1	ne(s) and Signature(s) of Inspector(s	)		Agency/Office/ Arkansas Depar	rtment	t of E	nvironmenta						Date 05 Apr	ril 2013			
0	W. Lamb			3400 West. Hill 870-862-0680/1				/1730									
Kerr	nature of Reviewer i McCabe, Inspector Supervisor wr: M <sup>e</sup> Gue			Arkansas Depar	rtment e Driv	t of Ei ve, N.	and Fax Numbers of Environmental Quality , N. Little Rock, AR 72118					Date April 8, 2013					

ADEQ Water NPDES Inspection
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AFIN: 22-00037

Permit #: AR0021831

SECTION A: PERMIT VERIFICATION	
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS	Øs 🗆m 🗇u 🗇na 🗇ne
DETAILS:	
1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE:	
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES:	DY DN ØNA DNE
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT:	
4. ALL DISCHARGES ARE PERMITTED:	
SECTION B: RECORDKEEPING AND REPORTING EVALUATION	
RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT	□s □m ∅u □na □ne
DETAILS: see page 3	
1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS:	
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE:	OS OM ØU ONA ONE
a. DATES AND TIME(S) OF SAMPLING:	
b. EXACT LOCATION(S) OF SAMPLING:	
c. NAME OF INDIVIDUAL PERFORMING SAMPLING:	
d. ANALYTICAL METHODS AND TECHNIQUES:	
e. RESULTS OF CALIBRATIONS:	
f. RESULTS OF ANALYSES:	
g. DATES AND TIMES OF ANALYSES:	
h. NAME OF PERSON(S) PERFORMING ANALYSES:	
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE:	
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR:	Øs 🗆 🗇 🖾 NA 🗆 NE
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA:	
SECTION C: OPERATIONS AND MAINTENANCE	
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED	□s □m ∅u □na □ne
DETAILS: see page 3	
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:	
9. STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED:	
10. PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED:	
11. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR:	
12. IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED:	
13. HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS:	
14. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT:	
15. IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT:	

SECTION D: SAMPLING	
PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS	□s □m ☑u □na □ne
DETAILS: see page 1	
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:	
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT:	🗹 y 🗆 n 🗆 na 🗆 ne
6. SAMPLE COLLECTION PROCEDURES ADEQUATE:	
a. SAMPLES REFRIGERATED DURING COMPOSITING:	🗹 y 🗆 n 🗆 na 🗆 ne
b. PROPER PRESERVATION TECHNIQUES USED:	Dy 🗹n Ona One
c. CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136:	
7. IF MONITORING IS PERFORMED MORE OFTEN THAN REQUIRED ARE RESULTS REPORTED ON THE DMR:	
SECTION E: FLOW MEASUREMENT	
PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS	Øs 🗆 m 🗇 u 🗆 na 🗆 ne
DETAILS:	
1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: TYPE OF DEVICE: weir	🗹 y 🗆 n 🗆 na 🗆 ne
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED:	
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED:	
4. CALIBRATION FREQUENCY ADEQUATE:	
5. RECORDS MAINTAINED OF CALIBRATION PROCEDURES:	
6. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE:	
7. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE:	
8. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES:	
9. HEAD MEASURED AT PROPER LOCATION:	
SECTION F: LABORATORY	
PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS	Øs 🗆 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:	
3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT:	Øy 🛛 n 🖓 na 🖓 ne
4. QUALITY CONTROL PROCEDURES ADEQUATE:	
5. DUPLICATE SAMPLES ARE ANALYZED ≥10% OF THE TIME:	
6. SPIKED SAMPLES ARE ANALYZED >10% OF THE TIME:	
7. COMMERCIAL LABORATORY USED:	
a. LAB NAME: McClelland Consulting Engineers	
b. LAB ADDRESS: Little Rock, AR	
c. PARAMETERS PERFORMED: all parameters but pH and Dissolved oxygen.	
8. BIOMONITORING PROCEDURES ADEQUATE:	
a. PROPER ORGANISMS USED:	
b. PROPER DILUTION SERIES FOLLOWED:	
c. PROPER TEST METHODS AND DURATION:	
d. RETESTS AND/OR TRE PERFORMED AS REQUIRED:	

ADEQ Water NPDES Inspection	

AFIN: 22-00037

Permit #: AR0021831

SECTION G: EFFLUENT/RECEIVING WATERS OBSERVATIONS									
BASED ON VISUAL OBSERVATIONS ONLY									
DETAILS	5:								
OUTFALL #	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	COLOR	OTHER		
001	No discharge								
			I	1	•				
SECTION H: SLUDGE DISPOSAL									
SLUDGE	DISPOSAL ME	ETS PERMIT F	REQUIREMEN	ГS		⊠s ⊡m			
DETAILS	6:		-						
1. SLUDGI	MANAGEMENT ADEQU	ATE TO MAINTAIN EF	FLUENT QUALITY:			⊠s			
2. SLUDGI	RECORDS MAINTAINE	D AS REQUIRED BY 40	) CFR 503:			⊠s			
3. FOR LA	ND APPLIED SLUDGE, T	YPE OF LAND APPLIE	D TO: (E.G., FOREST,	AGRICULTURAL, PUE	BLIC CONTACT SITE):				
SECTIO	NI: SAMPLIN	G INSPECTIO		JRES					
	RESULTS WITH								
DETAILS				-					
	S OBTAINED THIS INSP	ECTION:							
2. TYPE O									
3. SAMPLES PRESERVED:									
4. FLOW F									
5. SAMPLE									
6. SAMPLE	REPRESENTATIVE OF	VOLUME AND NATUR	E OF DISCHARGE:						
7. SAMPLE	SPLIT WITH PERMITTE	E:							
8. CHAIN-0	F-CUSTODY PROCEDU	RES EMPLOYED:							
9. SAMPLE	S COLLECTED IN ACCO	RDANCE WITH PERM	IT:						
SECTIO	N J: STORM \	<b>NATER POLL</b>	UTION PRE	<b>VENTION PL</b>	AN				
STORM	WATER MANAG	EMENT MEET	S PERMIT RE	QUIREMENTS	5	□s □m			
DETAILS	<u>;</u>								
1. SWPPP	UPDATED AS NEEDED:	DATE OF LAST UP	DATE:				□y □n Øna □ne		
2. SITE MA	P INCLUDING ALL DISC	HARGES AND SURFA	CE WATERS:						
3. POLLUT	ION PREVENTION TEAM	1 IDENTIFIED:							
4. POLLUT	ION PREVENTION TEAM	I PROPERLY TRAINED	):						
5. LIST OF	POTENTIAL POLLUTAN	T SOURCES:							
6. LIST OF	POTENTIAL SOURCES	AND PAST SPILLS ANI	D LEAKS:				Dy Dn Øna Dne		
7. ALL NO	-STORM WATER DISCH	ARGES ARE AUTHOR	IZED:				Dy On Øna One		
8. LIST OF	STRUCTURAL BMPS:								
9. LIST OF	NON-STRUCTURAL BMI	PS:							
10. BMPS P	ROPERLY OPERATED A	ND MAINTAINED:					□y □n Øna □ne		
11. INSPEC	TIONS CONDUCTED AS	REQUIRED:					Dy On Øna One		
						I			

ADEQ Water NPDES	ADEQ Water NPDES Inspection			Permit #: <b>AR0021831</b>						
	tion Che	ck								
<b>Reporting Period:</b>	From	2012	12	01	_ To	2012	12	31		
		Year	Month	Day		Year	Month	Day		
Parameter Checked:		Total osphorus	_							
	Loading				Concentration					
	Mass				Monthly					
	Mo. Avg lbs/day				Mo. Avg mg/l			7-day Avg mg/l		
<b>Reported Value:</b>					<1.0		<1.	0		
Calculated Value:	Calculated Value:			<1.0			<1.0			
Permit Value:				Report			Report			

If calculated value does not equal reported value, explain:

<u>equal</u>

ADEQ Water NPDES Inspection	
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			Wate	r Division NPDES Pho	tographic Ev	vidence Sheet		
Location:				East Plant				
Photographe		John W			Witness:	None		
Photo #	1	Of	2		Date:	3/25/2013	Time:	13:51
Description:		Curtain	on first	pond; not floating.				
Photographe	r:	John W	. Lamb		Witness:	None		
Photo #	2	Of	2		Date:	3/25/2013	Time:	13:501
Description:			g across	pond at location where c				



A Proud Heritage, A Promising Future . . .

April 22, 2013

Arkansas Department of Environmental Quality Mr. John W. Lamb, District 8 Field Inspector Water Division 5301 Northshore Drive North Little Rock, AR 72118-5317

RE: AFIN: 22-00037 NPDES Permit No: AR0021831 (EAST) AR0021822 (WEST) **Compliance** Inspection

Dear Mr. Lamb:

The city of Monticello is in receipt of your letter concerning the compliance inspection you performed on March 25, 2013 at the above mentioned facilities. Please find the following responses to these violations:

### AROO21831- EAST PLANT

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1. Facility did not have records for Quarterly Cooper Samples for the 3<sup>rd</sup>, and 4<sup>th</sup>. Quarter of 2012.

- 1. Description and Cause- Quarterly Cooper Sample Reports Missing, received late.
- 2. <u>Period of Noncompliance- We did not initially received these reports on time.</u> The reports were reported missing to us on March 21, 2013 in a letter from Lindsay Copenhaver, of ADEQ. They were mailed to ADEQ on April 1, 2013.
- 3. Steps taken to Prevent Recurrence- Lab personnel will do a better job in ascertaining that all reports have been received.

2. Curtain to the first pond at East Plant was under water and needed adjustment.

- 1. Description and Cause-Curtain under water due to high influent during a 3 month period.
- 2. <u>Period of Noncompliance- Approximately 3 months.</u>

3. Steps taken to Prevent Recurrence- Cable was adjusted on April17, 2013 and will be more closely monitored.

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## AR0021822- WEST PLANT

2. Chain of custodies for both plants did not indicated the phosphorus or nitrate-nitrite were taken, or properly preserved with acid and ice.

- 1. <u>Description and Cause-</u>Chain of custodies didn't indicate<sup>®</sup> proper samples taken or preserved due to a new requirement of permit.
- 2. <u>Period of Noncompliance-</u> From issue date of permit, August 2010 until compliance inspection.
- 3. <u>Steps taken to Prevent Recurrence-</u> New Chain of Custody forms have been created with the proper information recorded.

I hope this adequately addresses the concerns of the inspection from ADEQ. A copy of the missing 3<sup>rd</sup> and 4<sup>th</sup> Quarter 2012 Cooper Samples is enclosed. If any other information is needed please feel free to contact me.

Thank you for your consideration of this matter.

Sincerely,

Allen Maxwell, Mayor City of Monticello



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#### P. O. BOX 505 203 WEST GAINES MONTICELLO, ARKANSAS 71657

22 APR 2013 20 APR 20 APR 2013 20 APR 20 APR

#### ADEQ

Attn: Mr. John W. Lamb District 8 Field Inspector Water Division 5301 Northshore Drive North Little Rock, AR 72118-5317

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May 3, 2013

The Honorabe Allen Maxwell, Mayor City of Monitcello-East Plant P.O. Box 505 Monticello, AR 71655

# RE: Inadequate Response Letter (Drew Co) AFIN: 22-00037 NPDES Permit No.: AR0021831

Dear Mayor Maxwell:

I have reviewed the response pertaining to my March 25, 2013 inspection of the Monticello East and West Wastewater Treatment Plants. However, the information provided does not sufficiently addresses the violations referenced in my inspection report.

# Specifically, photos of the re-adjusted curtain at the East Plant are needed to complete your response.

These photos should be mailed to the address at the bottom of the letter or e-mailed to <u>Water-Inspection-report@adeq.state.ar.us</u>. These photos should be received no later than **May 17, 2013.** Please be sure to include the AFIN and Permit numbers with the photos.

Thank you for your attention to this matter. Should you have any questions, feel free to contact me at 870-862-0680 or you may e-mail me at <u>lambj@adeq.state.ar.us</u>.

Sincerely,

John W. famp

John W. Lamb District 8 Field Inspector Water Division

# **Rinearson**, Kassie

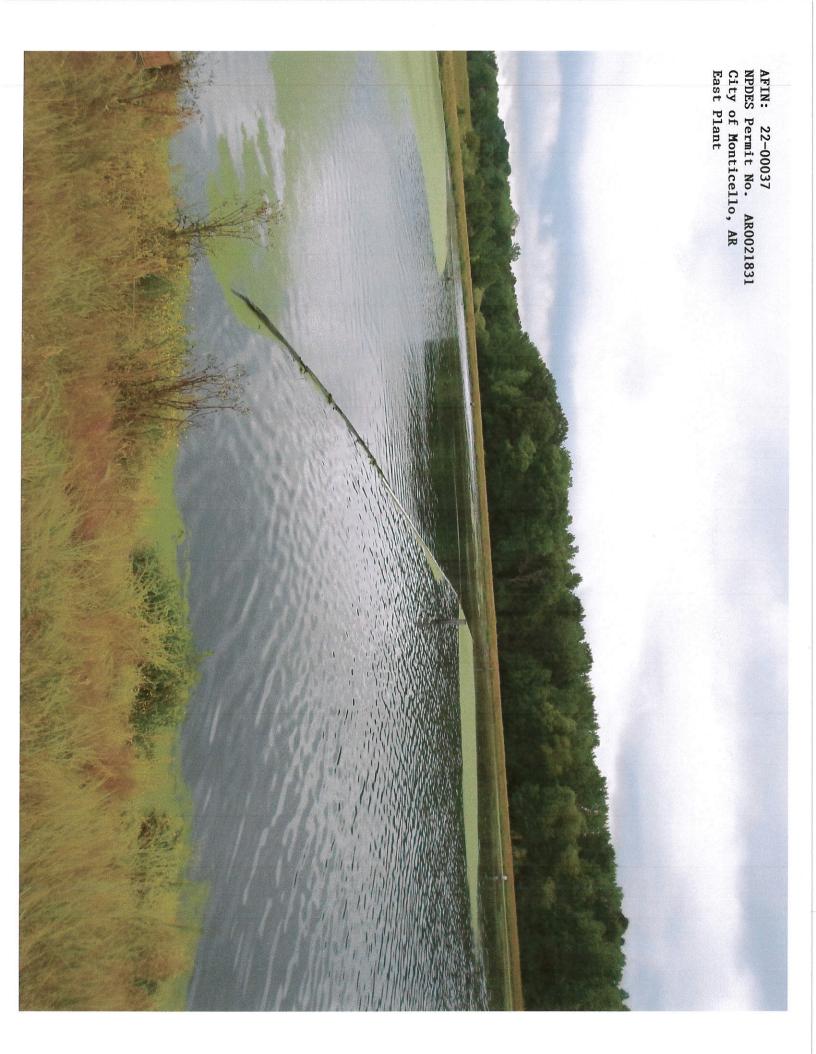
From:	Kimberly Fletcher <montcitykim@att.net></montcitykim@att.net>
Sent:	Thursday, May 16, 2013 11:34 AM
То:	Water-Inspection-Report
Subject:	Photos- AFIN 22-00037 NPDES Permit # AR0021831
Attachments:	montcity@att.net_20130516_111550.pdf

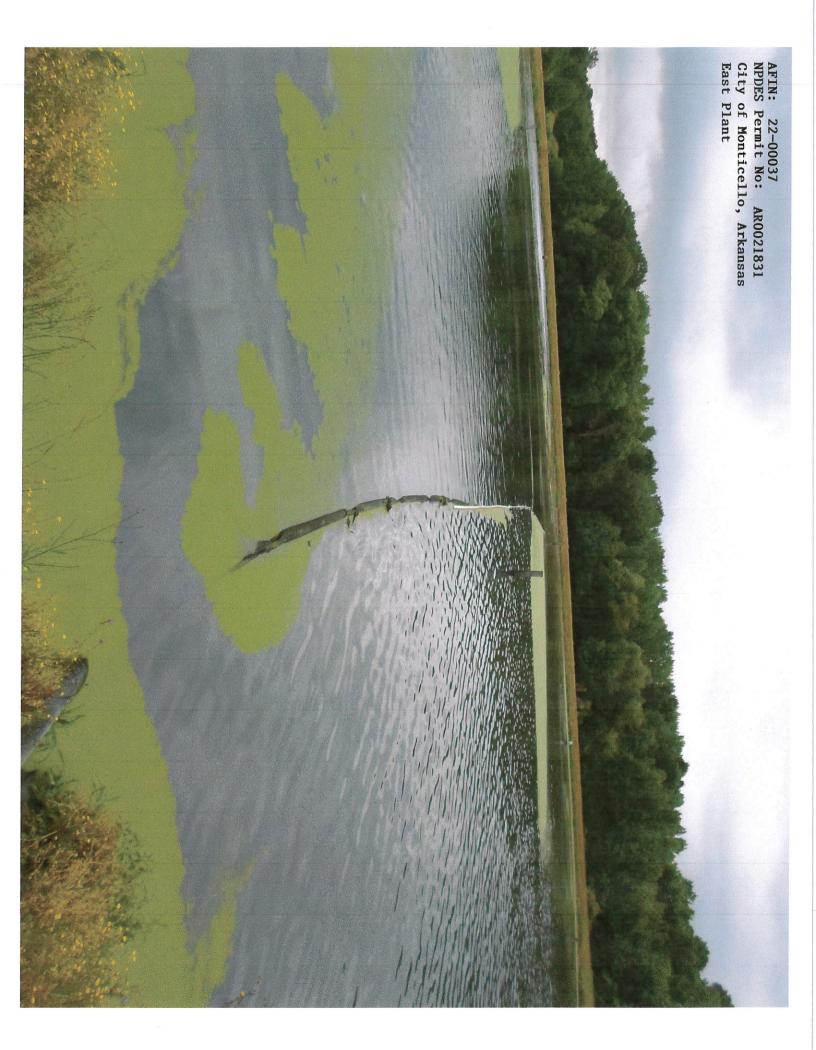
Per your letter to Mayor Maxwell dated 05-03-2013 please find the attached photos of the re-adjusted curtain at the East Plant.

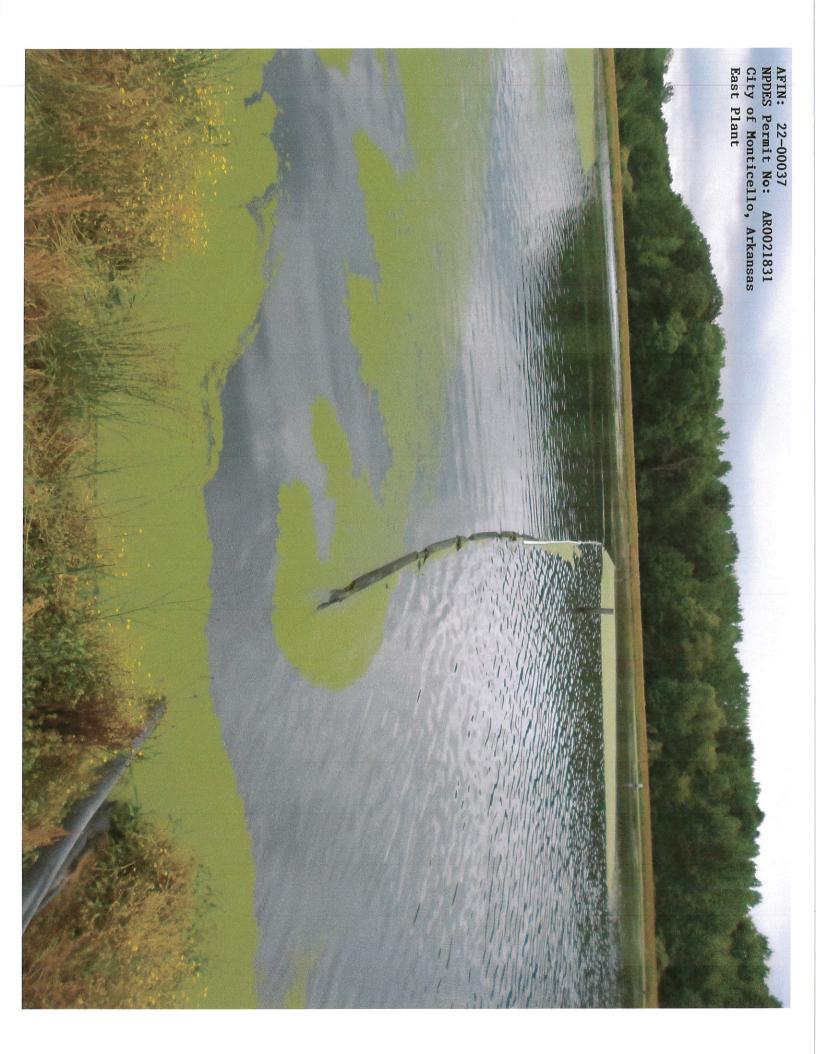
This should complete our response to your Annual Compliance Inspection.

If any other information is needed please feel free to contact us.

Thank you, Kimberly Fletcher









June 7, 2013

The Honorable Allen Maxwell City of Monitcello-East Plant P.O. Box 505 Monticello, AR 71655

# RE: Response Letter (Drew Co) AFIN: 22-00037 NPDES Permit No.: AR0021831

Dear Mayor Maxwell:

I have reviewed the response pertaining to my March 25, 2013 inspection of the Monticello East wastewater treatment facility. The information provided sufficiently addresses the violations referenced in my inspection report. At this time, the Department has no further comment concerning this particular inspection. Acceptance of this response by the Department does not preclude any future enforcement action deemed necessary at this site or any other site.

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 870-862-0680 or you may e-mail me at <a href="mailto:lambj@adeq.state.ar.us">lambj@adeq.state.ar.us</a>.

Sincerely,

John W. Jump

John W. Lamb District 8 Field Inspector Water Division