



ARKANSAS
Department of Environmental Quality

May 16, 2013

Honorable Jill Dabbs
Mayor, City of Bryant
1019 Southwest 2nd Street
Bryant, AR 72022

RE: Compliance Inspection
AFIN: 63-00065; NPDES Permit No.: AR0034002; No Exposure Certification ARR00C408

Dear Mayor Dabbs:

On May 2 and 3, 2013, Clark Baker, Inspector, ADEQ Water Division and I performed a compliance and no exposure certification inspection at the above-referenced facility. The inspection was conducted of the waste water 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. The following violations were observed at the time of inspection:

AR0034002

- 1) Evidence of sludge storage lagoon outfall piping was observed at the time of inspection (see photographs 1-12 of 12). This is a violation of A.C.A. § 8-4-217 (b)(1)(D) which states "It shall be unlawful for any person to engage in any of the following acts without having first obtained a written permit from the commission...to construct or use any new outlet for the discharge of any wastes into the waters of this state." Additionally, these are violations of Part III, B.1.a and Part III, B.3 of the permit.
- 2) Less than two feet of freeboard was observed in the sludge storage lagoon at the time of inspection (see photographs 3-8 of 12). Additionally, leachate was observed being trucked to and discharged directly into the sludge storage lagoon with less than two feet of freeboard present in the sludge storage lagoon at the time of inspection (see photographs 8-10 of 12). The water level in the sludge storage lagoon does not meet the standards in the **Recommended Standards for Wastewater Facilities** (10-States Standards) which was adopted by the Arkansas Pollution Control and Ecology Commission in Minute Order 80-21. The Arkansas Water and Air Pollution Control Act (A.C.A § 8-4-217(a)(3) makes it unlawful to violate any Order by the Commission. Per 10-States Standards the minimum freeboard level in the pond should be two feet. This is also in violation of Part III, B.1.a and Part III, B.3 of the permit.
- 3) Solids were observed on the surface on the sludge storage lagoon and are supporting a matted area of vegetative growth within the sludge storage lagoon. Vegetative growth was observed along the lagoon embankments (see photographs 3-8 of 12). Leachate was discharging from a breach in a hose and discharging on the ground surface (see photographs 8-12). This is in violation of Part III, B.1.a of the permit.
- 4) The analytical results are not consistent with data reported on DMRs. See NPDES Report Pages 8-9. The calculation numbers are requested in response to this inspection report.

ARR00C408

- The facility was issued a Notice for No Exposure Exclusion under the Industrial Stormwater General Permit, AR000000 (Permit Tracking No. ARR000605) effective March 3, 2011. All of the conditions under which the "No Exposure" Exclusion was issued were not verified during the site inspection (see attached inspection form). Discharge of stormwater under the conditions identified during the inspection is not eligible under the No Exposure Exclusion (ARR000C408) issued to this facility. Specifically, materials or residuals are on the ground and stored outdoors (see photographs 11-12 of 12).

ARR150000

- Additionally, regarding the Bryant Street Department's placement of soil in the former polishing pond at the Bryant Wastewater Plant (see photograph 12 of 12); please be aware that construction projects that will disturb in excess of one (1) acre are required to comply with the terms of the Stormwater Construction General Permit Number ARR150000. Based on Google Earth calculation, this site is currently at least one acre in size. Should you have any questions, the ADEQ General Permits Branch may be reached at 501-682-0623 for additional information.

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 Water-Inspection-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 documentation (i.e. photos) is due by **May 30, 2013**. If I can be of any assistance, please contact me 501-682-0658 or parkerr@adeq.state.ar.us.

Sincerely,



Risa Parker
District 9 Field Inspector
Water Division



Form Approved
OMB No. 2040-0003

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, D.C. 20460

NPDES Compliance Inspection Report

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	3	4	0	0	2	11	12	1	3	0	5	0	2	18	C	19	S	20	1																																												
Remarks																																																																							
A						F						I						N						6						3						-						0						0						0						6						5					
Inspection Work Days						Facility Evaluation Rating						BI		QA		-----Reserved-----																																																							
67						70						71		72		73		74		75		76		77		78		79		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 Bryant Wastewater Treatment Plant 1019 Southwest 2nd Street Bryant, AR 72022	Entry Time/Date 5/2/13-10:00 am 5/3/13-10:15 am	Permit Effective Date 2/1/2009
	Exit Time/Date 5/2/13-11:00 am 5/3/13-10:45 am	Permit Expiration Date 1/31/2014
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Gregg Asher, Chief Plant Operator, Bryant Water Utilities, 501-366-7430	Other Facility Data MAJOR MUNICIPAL	
Name, Address of Responsible Official/Title/Phone and Fax Number Honorable Jill Dabbs Mayor, City of Bryant 1019 Southwest 2nd Street Bryant, AR 72022	Contacted Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	

Section C: Areas Evaluated During Inspection

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

S	Permit	S	Flow Measurement	U	Operations & Maintenance	S	Sampling
M	Records/Reports	S	Self-Monitoring Program	M	Sludge Handling/Disposal	N	Pollution Prevention
U	Facility Site Review	N	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)

A summary of findings/comments are on the cover letter.

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Telephone/Fax	Date
Risa Parker/	ADEQ / Little Rock / 501-682-0658 / 501-682-0910	5/9/13
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

Note: Outfall piping exits the sludge storage lagoon prior to Outfall 001.

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: S 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: Construction occurring on the EQ basin (AR0034002C). 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: None reported. 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: Yes TYPE OF DEVICE: 90° V-notch weir | <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: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 5. RECORDS MAINTAINED OF CALIBRATION PROCEDURES: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 6. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE: | <input checked="" type="checkbox"/> Y <input 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 checked="" type="checkbox"/> Y <input type="checkbox"/> N <input 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 checked="" type="checkbox"/> Y <input 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: McClelland Consulting Engineers, Inc.; 501-378-7808 | |
| b. LAB ADDRESS: | |
| c. PARAMETERS PERFORMED: NH3-N; CBOD5, Fecal Coliform, Nitrite, Total Phosphorus, TSS | |
| 8. BIOMONITORING PROCEDURES ADEQUATE: | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE |
| a. PROPER ORGANISMS USED: | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE |
| b. PROPER DILUTION SERIES FOLLOWED: | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE |
| c. PROPER TEST METHODS AND DURATION: | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE |
| d. RETESTS AND/OR TRE PERFORMED AS REQUIRED: | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE |

TSS results for March 2013 all end in .0 (i.e. 7.0, 5.0). This was reported to Jane Hurley, Chemist Supervisor, ADEQ Technical Services Division.

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	None	None

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):

Note: Sludge storage lagoon has less than two feet of freeboard.

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

Facility has No Exposure Exclusion under Industrial Stormwater General Permit (IGP) ARR000000.

FLOW CALCULATION SHEET

Date: 5/2/13				Time: 10:25 am	
Head in Inches: 13		Feet: 1.1			
Type & Size of Primary Flow Measurement Device: 90° V-notch weir					
Name & Model of Secondary Flow Measurement Device:				Badger 2100 MB/PDS-360-E	
Date of last Calibration of Secondary Flow Device: 12/14/12					
Recorded Flow at Date & Time Listed Above:				1347 (Facility Flow Meter)	
Calculated Flow at Date & Time Listed Above:				1424	
(Flow is calculated using flow charts in: <u>ISCO Open Channel Flow Measurement Handbook-5th Edition</u>)					
% Error =	Recorded Value	-	Calculated Value	X 100	
	Calculated Value				
% Error =	1347	-	1424	X 100	
	1424				
% Error =	-77	X 100			
	1424				
% Error =	-0.54	X 100	-5.4		
% Error =	-5.4	%			
Comments: Within +/- 10%					

DMR Calculation Check

Reporting Period: From 2013 03 01 To 2013 03 31
Year Month Day Year Month Day

Parameter Checked: CBOD5

	Loading Mass Mo. Avg. - lbs/day	Concentration Monthly Mo. Avg. - mg/l	7-day Avg. - mg/l
Reported Value:	<u>46.98</u>	<u>*3.06</u>	<u>**3.51</u>
Calculated Value:	<u>46.98</u>	<u>3.07</u>	<u>3.24</u>
Permit Value:	<u>250.2</u>	<u>10</u>	<u>15.0</u>

If calculated value does not equal reported value, explain:
* Rounding error.
** Facility must submit calculation numbers in response to the inspection report.

DMR Calculation Check

Reporting Period: From 2013 03 01 2013 03 31
Year Month Day Year Month Day

Parameter Checked: Ammonia Nitrogen (NH3-N)

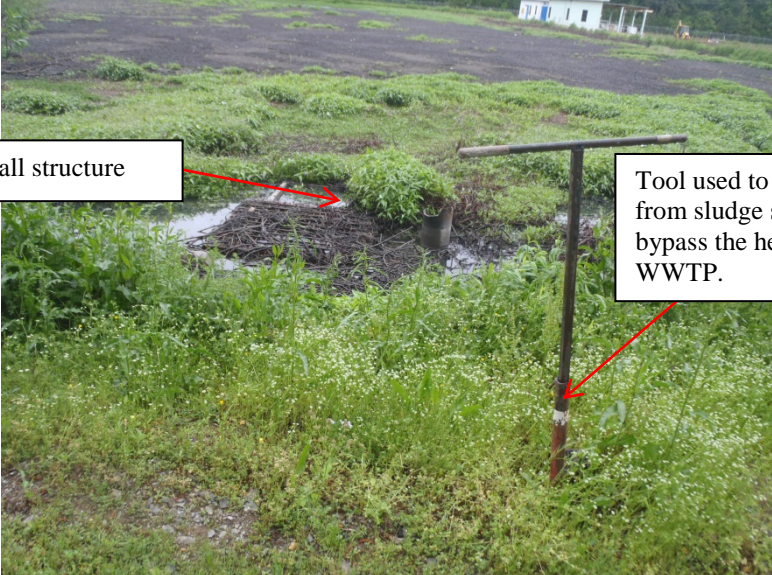
	Loading Mass Mo. Avg. - lbs/day	Concentration Monthly Mo. Avg. - mg/l	7-day Avg. - mg/l
Reported Value:	<u>*18.47</u>	<u>**1.22</u>	<u>***1.56</u>
Calculated Value:	<u>10.62</u>	<u>0.73</u>	<u>1.57</u>
Permit Value:	<u>150.1</u>	<u>6.0</u>	<u>9.0</u>

If calculated value does not equal reported value, explain:

- *, ** Facility must submit calculation numbers in response to the inspection report.
- *** Rounding error.

Water Division NPDES Photographic Evidence Sheet

Location:		Bryant Wastewater Treatment Plant					
Photographer:		Risa Parker, ADEQ Water Division		Witness:		Clark Baker, ADEQ Water Division	
Photo # 1	Of	12		Date:	5/3/13	Time:	10:14 am
Description:		See description below.					



Outfall structure

Tool used to turn valve to discharge from sludge storage lagoon and bypass the head works of the WWTP.

Photo # 2	Of	12		Date:	5/3/13	Time:	10:16 am
Description:		Outfall pipe for the sludge storage lagoon.					



Water Division NPDES Photographic Evidence Sheet

Location: Bryant Wastewater Treatment Plant

Photographer: Risa Parker, ADEQ Water Division **Witness:** Clark Baker, ADEQ Water Division

Photo # 5 **Of** 12 **Date:** 5/2/13 **Time:** 10:47 am

Description: Less than two feet of freeboard in the sludge storage lagoon and the presence of vegetation in the lagoon and surrounding the lagoon embankments.



Photo # 6 **Of** 12 **Date:** 5/2/13 **Time:** 10:42 am

Description: Less than two feet of freeboard in the sludge storage lagoon and the presence of vegetation in the lagoon and surrounding the lagoon embankments. The folder visible in photo is approximately 12 inches long.



Water Division NPDES Photographic Evidence Sheet

Location: Bryant Wastewater Treatment Plant

Photographer: Risa Parker, ADEQ Water Division **Witness:** Clark Baker, ADEQ Water Division

Photo # 7 **Of** 12 **Date:** 5/2/13 **Time:** 10:39 am

Description: Less than two feet of freeboard in the sludge storage lagoon and the presence of vegetation in the lagoon and surrounding the lagoon embankments.



Photo # 8 **Of** 12 **Date:** 5/2/13 **Time:** 10:39 am

Description: Leachate being discharged directly into the sludge storage lagoon which does not have two feet of freeboard.



Water Division NPDES Photographic Evidence Sheet

Location:	Bryant Wastewater Treatment Plant					
Photographer:	Risa Parker, ADEQ Water Division		Witness:	Clark Baker, ADEQ Water Division		
Photo # 9	Of	12		Date:	5/2/13	Time: 10:53 am
Description:	Leachate was discharging from a breach in a hose and discharging on the ground surface.					



Photo # 10	Of	12		Date:	5/2/13	Time: 10:53 am
Description:	Leachate was discharging from a breach in a hose and discharging on the ground surface					



Water Division NPDES Photographic Evidence Sheet

Location: Bryant Wastewater Treatment Plant

Photographer: Risa Parker, ADEQ Water Division **Witness:** Clark Baker, ADEQ Water Division

Photo # 11 **Of** 12 **Date:** 5/3/13 **Time:** 10:28 am

Description: Solids from the treatment facility located on the ground surface--discharge of stormwater under this condition is not eligible under the No Exposure Exclusion (ARR000C408) issued to this facility.



Photo # 12 **Of** 12 **Date:** 5/2/13 **Time:** 11:00 am

Description: The Bryant Street Department is bringing in soil and placing it in the closed polishing pond---discharge of stormwater under this condition is not eligible under the No Exposure Exclusion (ARR000C408) issued to this facility.





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, D.C. 20460

Form Approved
OMB No. 2040-0003
Approval Expires 7-31-85

NPDES Compliance Inspection Report

Section A: National Data System Coding

Transaction Code	NPDES	Yr/Mo/Day	Inspec. Type	Inspector	Fac. Type																		
1 N 2 5 3 A R R 0 0 C 4 0 8		1 2 0 5 0 2	J	C	2																		
Remarks																							
<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:10%;">A</td><td style="width:10%;">F</td><td style="width:10%;">I</td><td style="width:10%;">N</td><td style="width:10%;">6</td><td style="width:10%;">3</td><td style="width:10%;">-</td><td style="width:10%;">0</td><td style="width:10%;">0</td><td style="width:10%;">0</td><td style="width:10%;">6</td><td style="width:10%;">5</td><td style="width:10%;"></td><td style="width:10%;"></td><td style="width:10%;"></td><td style="width:10%;"></td><td style="width:10%;"></td><td style="width:10%;"></td> </tr> </table>						A	F	I	N	6	3	-	0	0	0	6	5						
A	F	I	N	6	3	-	0	0	0	6	5												
Inspection Work Days		Facility Evaluation Rating		BI	QA	-----Reserved-----																	
67			69	70	N	71	N	72	N	73		74		75		76							

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 Bryant Wastewater Treatment Plant 1019 Southwest 2nd Street Bryant, AR 72022	Entry Time/Date 5/2/13-10:00 am 5/3/13-10:15 am	Permit Effective Date 3/03/2011
	Exit Time/Date 5/2/13-11:00 am 5/3/13-10:45 am	Permit Expiration Date 6/30/2014

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Gregg Asher, Chief Plant Operator, Bryant Water Utilities, 501-366-7430	Other Facility Data Industrial SW Permit (mini)
Honorable Jill Dabbs Mayor, City of Bryant 1019 Southwest 2 nd Street Bryant, AR 72022	Contacted Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>

Section C: Areas Evaluated During Inspection

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

U	Permit	N	Flow Measurement	U	Operations & Maintenance	N	Sampling
N	Records/Reports	N	Self-Monitoring Program	N	Sludge Handling/Disposal	N	Pollution Prevention
U	Facility Site Review	N	Compliance Schedules	N	Pretreatment	N	Multimedia
N	Effluent/Receiving Waters	N	Laboratory	U	Storm Water	N	Other:

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

A summary of findings/comments are on the cover letter.

Name(s) and Signature(s) of Inspector(s) Risa Parker/	Agency/Office/Telephone/Fax ADEQ/Water Division/501-682-0658/501-682-0910	Date 5/9/13
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date

No Exposure Exclusion Verification	
Are any of the following materials or activities exposed to precipitation, now or in the foreseeable future? Answering "Yes" to any of these questions indicates the facility is <u>not</u> eligible for the No Exposure Exclusion.	
a. Using, storing, or cleaning industrial machinery or equipment, and areas where residuals from using, storing, or cleaning industrial machinery or equipment remain and are exposed to storm water.	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N
Comments:	
b. Are materials or residuals on the ground or in storm water inlets from spills/leaks.	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N
Comments:	
c. Are materials or products from past industrial activity exposed.	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N
Comments:	
d. Is material handling equipment exposed (except adequately maintained vehicles).	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N
Comments:	
e. Are materials or products during loading/unloading or transporting activities exposed.	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N
Comments:	
f. Materials or products stored outdoors (except final products intended for outside use [e.g., new cars] where exposure to storm water does not result in the discharge of pollutants).	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N
Comments:	
g. Materials contained in open, deteriorated, or leaking storage drums, barrels, tanks, and similar containers.	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N
Comments:	
h. Materials or products handled/stored on roads or railways owned or maintained by the discharger.	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N
Comments:	
i. Waste materials exposed (except waste in covered, non-leaking containers [e.g., dumpsters]).	<input type="checkbox"/> Y <input type="checkbox"/> N
Comments:	
j. Application or disposal of process wastewater (unless otherwise permitted).	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N
Comments:	
k. Particulate matter or visible deposits of residuals from roof stacks and/or vents not otherwise regulated (i.e., under an air quality control permit) and evident in the storm water outflow.	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N
Comments:	
General Comments: Placement of solids from the WWTP and soil from a Bryant Street Department job were observed on the ground surface at the time of investigation.	

ADEQ

ARKANSAS
Department of Environmental Quality

CERTIFIED LETTER: 91 7199 9991 7030 4906 2854

June 14, 2013

Honorable Jill Dabbs
Mayor, City of Bryant
1019 Southwest 2nd Street
Bryant, AR 72022

RE: Compliance Inspection
AFIN: 63-00065; NPDES Permit No.: AR0034002
No Exposure Certification ARR00C408

Dear Mayor Dabbs:

A letter dated May 16, 2013 was sent to the City of Bryant by the ADEQ. The letter outlined the findings of a May 2-3, 2013 inspection of the above referenced facility. The letter requested that a written response be submitted to the Water Division Inspection Branch of this Department by May 30, 2013. To date, no response has been received.

Please submit a response by **July 1, 2013**. A copy of the inspection report has been included for your convenience. Thank you for your attention to this matter. Should you have any questions, feel free to contact me at 501-682-0658 or you may e-mail me at parkerr@adeq.state.ar.us.

Sincerely,



Risa Parker
District 9 Field Inspector
Water Division

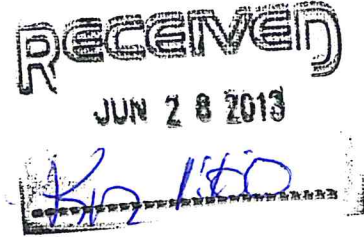


1405 North Pierce Street, Suite 301
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Stewart W. Noland
Leslie B. Price
Matthew D. Dunn
Richard W. Zelnick
Craig A. Johnson

June 28, 2013

Ms. Risa Parker
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, Arkansas 72118



Re: Response to Compliance Inspection Letter Dated May 16, 2013
AFIN: 63-00065; NPDES Permit No.: AR0034002
No Exposure Certification ARR00C408
Bryant, Arkansas

Dear Ms. Parker:

The following are in response to your comments dated May 2, 2013 concerning the above referenced permits.

AR0034002

1. Currently there is a concrete outlet structure with drain piping and a valve that is connected to the 24-inch outfall from the wastewater plant (see attached drawing). The sludge lagoon outfall structure and drain pipe are no longer used. The City of Bryant has submitted a plan to ADEQ to decommission the structure and drain pipe; however, due to the location and depth of the pipe, the City has not been able to safely excavate the drain piping in order to remove the valve and a section of pipe. The City is requesting approval to modify the plan as follows:

- a. Block off the outlet piping inside the concrete outlet structure, remove the grate at the top of the structure, and pour a concrete cap at the top of the structure. This method would prevent excavation of the sludge lagoon levee and would be a much safer alternative.
- b. Remove the valve box and fill the void with dirt to prevent access to the valve.

2. The water level in the sludge lagoon is maintained using the outlet structure in the northeast corner of the sludge lagoon and a staff gauge at the lowest point in the levee. Sludge decant drains through the structure to the inlet works building wetwell and back through the treatment plant (see attached drawing). At the time of the inspection, construction activity at the wastewater treatment plant included work in the inlet works building wetwell and the equalization basin so they were not in service. Since the compliance inspection, the inlet works building wetwell has been returned to service and the two feet of freeboard has been achieved. The City of Bryant will inform all haulers that piping and hoses from trucks shall not have any leaks, holes, etc.

3. The City of Bryant will spray the vegetative growth that was observed on the matted area and along the lagoon embankments within the sludge storage lagoon with a herbicide in order to kill the vegetation.

4. According to the ADEQ NPDES Reporting Requirements Handbook dated September 13, 2004, item 3 on page 22 and 23 (see attached), “the 7-day average must be reported in the month that the Saturday falls in. For example, May 1, 1999 is a Saturday. Samples collected from April 25 through May 1, 1999, should be averaged and reported as a 7 day average during the month of May since the Saturday of the week falls in May.” For March 2013, the CBOD5 samples collected on February 26th, 27th, and 28th, were reported on the March DMR since the Saturday of the week was in March (March 2nd). Using this method, the CBOD5 7-day average for March should be 3.51 mg/l as reported on the March DMR and not 3.24 mg/l as shown in your calculations. For Ammonia Nitrogen the operator input the wrong test result for March 5, 2013 into their spreadsheet therefore giving incorrect DMR values. The operator input 6.44 mg/l for Ammonia Nitrogen and he should have input 0.44 mg/l. Using the correct value of 0.44 mg/l results in a corrected monthly average value of 10.62 lbs/day and not 18.47 lbs/day as reported (see attached). The City of Bryant will submit corrected DMR’s to ADEQ (see attached). Please note that the error for Ammonia Nitrogen resulted in a higher reported value of 18.47 lbs/day than the actual value of 10.62 lbs/day that should have been reported and neither value exceeded the NPDES permit limit.

ARR00C408

1. The solids have been removed and placed in the sand drying beds.

ARR150000

1. A stormwater pollution prevention plan and Notice of Coverage has been posted at the site.

Please contact me if you have any questions or need additional information.

Sincerely,
Crist Engineers, Inc.



Les Price

cc: Monty Ledbetter

Corrected Values

Date	Lab #	BOD mg/l	BOD lbs	TSS mg/l	TSS lbs	NH3 mg/l	NH3 lbs	No2+No3	N lbs		
5-Mar-13	38893.01	3.56	55.93671	8	125.7005	0.44	6.913526	7.2	113.1304		
6-Mar-13	38899.01	3.14	49.12794	5	78.2292	0.22	3.442085	8.7	136.1188		
7-Mar-13	38917.01	2.61	40.68327	6	93.52476	0.22	3.429241	10	155.8746		
12-Mar-13	38940.01	3.3	54.85135	6	99.72972	0.23	3.822973	6.8	113.027		
13-Mar-13	38948.01	2.55	40.4711	7	111.0971	0.32	5.078726	7.6	120.6198		
14-Mar-13	38954.01	2.4	39.89189	6	99.72972	0.23	3.822973	10	166.2162		
19-Mar-13	38974.01	4.71	66.1106	9	126.326	2.6	36.49417	6.4	89.83181		
20-Mar-13	38992.01	2.61	33.21705	9	114.5416	1.14	14.5086	7.1	90.36056		
21-Mar-13	38999.01	2.4	34.42752	10	143.448	0.96	13.77101	9.1	130.5377		
26-Mar-13	39012.01	3.6	58.4267	7	113.6075	0.58	9.413191	8.8	142.8208		
27-Mar-13	39026.01	2.88	42.99437	8	119.4288	1.11	16.57075	10	149.286		
28-Mar-13	39034.01	3.06	47.64659	5	77.8539	0.65	10.12101	11	171.2786		
			0		0		0		0		
			0		0		0		0		
			0		0		0		0		
		36.82	563.7851	86	1303.217	8.7	127.3882	102.7	1579.102		
		pH	D.O.	Chlorine	MGD	daily flow	FC	FC Log	P	mg/l	P lbs
5-Mar-13	38893.01	6.4	8.6	0.02	1.884	1884000	10	1	2.2	34.56763	
6-Mar-13	38899.01	6.5	8.7	0.02	1.876	1876000	20	1.30103	2.2	34.42085	
7-Mar-13	38917.01	6.7	8.8	0.02	1.869	1869000	24	1.380211	2.4	37.4099	
12-Mar-13	38940.01	6.5	9.6	0.06	1.993	1993000	60	1.778151	2	33.24324	
13-Mar-13	38948.01	6.9	9	0.04	1.903	1903000	10	1	2.3	36.50335	
14-Mar-13	38954.01	6.9	8.5	0.02	1.993	1993000	10	1	2.4	39.89189	
19-Mar-13	38974.01	7	8.4	0.03	1.683	1683000	4	0.60206	3	42.10866	
20-Mar-13	38992.01	6.9	8.4	0.02	1.526	1526000	60	1.778151	3	38.18052	
21-Mar-13	38999.01	6.98	8.52	0.04	1.720	1720000	4	0.60206	3.2	45.90336	
26-Mar-13	39012.01	6.87	8.86	0.06	1.946	1946000	30	1.477121	2	32.45928	
27-Mar-13	39026.01	6.68	8.61	0.04	1.790	1790000	4	0.60206	2.2	32.84292	
28-Mar-13	39034.01	6.75	8.87	0.04	1.867	1867000	12	1.079181	2.3	35.81279	
0-Jan-00	0.00					0.000				0	
0-Jan-00	0.00					0.000				0	
0-Jan-00	0.00					0.000				0	
		pH MIN	D.O. AVG	Cl2 MAX	total flow			1.133336	29.2	443.3444	
		6.4	8.738333	0.06	22.050			FC AVG			
		pH MAX						13.59363			
		7									
		7 day Average									
BOD	TSS	NH3	FC	t p	n n						
3.5166667	7.6666667	1.133333	54.28835	1.6	8.2						
3.1033333	6.3333333	0.161333	16.86865	2.26667	8.633333						
2.75	6.3333333	0.26	18.17121	2.23333	8.133333						
3.24	9.3333333	1.566667	9.864848	3.06667	7.533333						
3.18	6.6666667	0.78	11.29243	2.16667	9.933333						
0	0	0		0	0						
7 day	7 day	7 day	7 day	7 day	7 day						
3.5166667	9.3333333	1.566667	54.28835	3.06667	9.933333						
BOD load	TSS load	NH3 load		P load	N load						
46.98209	108.601395	10.61569		36.9454	131.5919						
BOD conc	TSS conc	NH3 conc		P conc	N load						
3.0683333	7.1666667	0.725		2.43333	8.558333						

Client: City of Bryant

Sample Number: 38893-01

Sample Description:

Date Reported: 3/26/2013

Sample Location: effluent

Permit Number:

References: 40 CFR Part 136 Approved Methods, Containers, Preservation, Holding Times
Standard Methods for the Examination of Water and Wastewater: EPA-600/4-79-020

Quality Control: Blank, duplication, known addition, quarterly analysis of external references samples

QA Frequency: Minimum of 10% Spikes and Duplicates

Date/Time	Grab Date/Time	Sampler	Composite Date/Time	Sampler	Date/Time Received: 03/05/13 15:45
	03/05/13 15:00				

Parameter	Reference	Test Date/Time	Initials	Result
Ammonia Nitrogen				
Ammonia, NH3-N	4500-NH3,B,C			0.44 mg/l
cBOD 5 day				
cBOD	5210 B			3.56 mg/l
Chlorine Residual				
Chlorine residual	4500-Cl-G	3/5/2013 3:04:00 PM	MB	0.020 mg/l
Dissolved Oxygen				
DO	4500-O c or g	3/5/2013 3:03:00 PM	MB	8.6 mg/l
Fecal Coliform				
Fecal Coliforms	9222 D		MB	10 Col/100 mls
Nitrite				
Nitrite	4500-NO2 B		MB	7.2 mg/l
pH				
pH	4500-H+ B	3/5/2013 3:01:00 PM	MB	6.4 pH Units
Total Phosphorus				
Phosphorus	EPA 365.2		MB	2.2 mg/l
Total Suspended Solids				
TSS	2540 D			8.0 mg/l

Incorrect Values

Date	Lab #	BOD mg/l	BOD lbs	TSS mg/l	TSS lbs	NH3 mg/l	NH3 lbs	No2+No3	N lbs		
5-Mar-13	38893.01	3.56	55.93671	8	125.7005	6.44	101.1889	7.2	113.1304		
6-Mar-13	38899.01	3.14	49.12794	5	78.2292	0.22	3.442085	8.7	136.1188		
7-Mar-13	38917.01	2.61	40.68327	6	93.52476	0.22	3.429241	10	155.8746		
12-Mar-13	38940.01	3.3	54.85135	6	99.72972	0.23	3.822973	6.8	113.027		
13-Mar-13	38948.01	2.55	40.4711	7	111.0971	0.32	5.078726	7.6	120.6198		
14-Mar-13	38954.01	2.4	39.89189	6	99.72972	0.23	3.822973	10	166.2162		
19-Mar-13	38974.01	4.71	66.1106	9	126.326	2.6	36.49417	6.4	89.83181		
20-Mar-13	38992.01	2.61	33.21705	9	114.5416	1.14	14.5086	7.1	90.36056		
21-Mar-13	38999.01	2.4	34.42752	10	143.448	0.96	13.77101	9.1	130.5377		
26-Mar-13	39012.01	3.6	58.4267	7	113.6075	0.58	9.413191	8.8	142.8208		
27-Mar-13	39026.01	2.88	42.99437	8	119.4288	1.11	16.57075	10	149.286		
28-Mar-13	39034.01	3.06	47.64659	5	77.8539	0.65	10.12101	11	171.2786		
			0		0		0		0		
			0		0		0		0		
			0		0		0		0		
		36.82	563.7851	86	1303.217	14.7	221.6636	102.7	1579.102		
		pH	D.O.	Chlorine	MGD	daily flow	FC	FC Log	P	mg/l	P lbs
5-Mar-13	38893.01	6.4	8.6	0.02	1.884	1884000	10	1	2.2	34.56763	
6-Mar-13	38899.01	6.5	8.7	0.02	1.876	1876000	20	1.30103	2.2	34.42085	
7-Mar-13	38917.01	6.7	8.8	0.02	1.869	1869000	24	1.380211	2.4	37.4099	
12-Mar-13	38940.01	6.5	9.6	0.06	1.993	1993000	60	1.778151	2	33.24324	
13-Mar-13	38948.01	6.9	9	0.04	1.903	1903000	10	1	2.3	36.50335	
14-Mar-13	38954.01	6.9	8.5	0.02	1.993	1993000	10	1	2.4	39.89189	
19-Mar-13	38974.01	7	8.4	0.03	1.683	1683000	4	0.60206	3	42.10866	
20-Mar-13	38992.01	6.9	8.4	0.02	1.526	1526000	60	1.778151	3	38.18052	
21-Mar-13	38999.01	6.98	8.52	0.04	1.720	1720000	4	0.60206	3.2	45.90336	
26-Mar-13	39012.01	6.87	8.86	0.06	1.946	1946000	30	1.477121	2	32.45928	
27-Mar-13	39026.01	6.68	8.61	0.04	1.790	1790000	4	0.60206	2.2	32.84292	
28-Mar-13	39034.01	6.75	8.87	0.04	1.867	1867000	12	1.079181	2.3	35.81279	
0-Jan-00	0.00					0.000				0	
0-Jan-00	0.00					0.000				0	
0-Jan-00	0.00					0.000				0	
		pH MIN	D.O. AVG	Cl2 MAX	total flow			1.133336	29.2	443.3444	
		6.4	8.738333	0.06	22.050			FC AVG			
		pH MAX						13.59363			
		7									
		7 day Average									
BOD	TSS	NH3	FC	t p	n n						
3.5166667	7.6666667	1.133333	54.28835	1.6	8.2						
3.1033333	6.3333333	0.161333	16.86865	2.26667	8.633333						
2.75	6.3333333	0.26	18.17121	2.23333	8.133333						
3.24	9.3333333	1.566667	9.864848	3.06667	7.533333						
3.18	6.6666667	0.78	11.29243	2.16667	9.933333						
0	0	0		0	0						
7 day	7 day	7 day	7 day	7 day	7 day						
3.5166667	9.3333333	1.566667	54.28835	3.06667	9.933333						
BOD load	TSS load	NH3 load		P load	N load						
46.98209	108.601395	18.47197		36.9454	131.5919						
BOD conc	TSS conc	NH3 conc		P conc	N load						
3.0683333	7.1666667	1.225		2.43333	8.558333						

**NPDES
REPORTING
REQUIREMENTS
HANDBOOK**

ADEQ

A R K A N S A S
Department of Environmental Quality

September 13, 2004

NPDES ENFORCEMENT BRANCH

WATER DIVISION

MOST COMMONLY ASKED QUESTIONS

1. How do I report "too numerous to count" coliform samples?

Fecal Coliform samples that are "too numerous to count" must be reported as a greater (>) than value on the DMR form. A greater (>) than value reported on the DMR exceeds the permit limit and is considered a permit violation.

2. How do I count number of exceedances?

*Exceedances for DMR reporting are the number of sample measurements that exceed a daily maximum, daily minimum, 7-day average, or instantaneous limit (pH and dissolved oxygen). Just count each sample measurement that is a violation of the daily maximum, daily minimum, 7-day average, or instantaneous limit and enter the number in the **NO. EX.** column.*

DO NOT INCLUDE 30-DAY AVERAGES, DAILY AVERAGES, OR MONTHLY AVERAGES AS EXCEEDANCES ON DMR. *It is obvious if you have exceeded an average measurement since you report the **one** average measurement on the DMR. Daily maximum, daily minimum, 7-day average, or instantaneous limit measurements only require the highest or lowest sample value during the monitoring period be reported on the DMR. Therefore, the number of exceedances (No.Ex.) column is designed to inform the Department of other samples which exceeded the daily maximum, daily minimum, 7-day average, or instantaneous limit. The individual violations should be detailed in the required noncompliance report.*

3. How do I calculate and report 7-day averages?

A 7-day average is an arithmetic average of the samples collected during a calendar week. In the State of Arkansas, the 7-day week ends on Saturday,

and therefore, the 7-day average must be reported in the month that the Saturday falls in. For example, May 1, 1999, is a Saturday. Samples collected from April 25 through May 1, 1999, should be averaged and reported as a 7-day average during the month of May since the Saturday of the week falls in May.

The samples collected during April 25 through April 30 will be included with the other April samples for the purpose of reporting the monthly average in April. Only the highest 7-day average during the month will be reported on the DMR.

4. Who can sign a DMR?

The NPDES Permit and EPA regulation 40CFR122 are very specific about who can sign any NPDES required report including DMRs. The authorized signatory official (also known as cognizant official) is the individual who signs the permit application and must meet the requirements contained in the permit (mayor, corporate officer, etc.). The authorized signatory official can delegate signatory authority to another person provided that the individual is responsible for the overall operation of the facility and this authorization must be made in writing and on file at ADEQ. ADEQ has developed a form to facilitate signatory delegation which can be found in the Appendix.

5. Do I have to sign each page of my DMR?

Yes. Each page must be signed and dated. If any revisions are submitted, the revised page must also have an original signature and new signature date.

6. How many copies of the DMR do I submit to the Department?

You must submit the original and first carbon copy to the Department. The original is the official file copy and the first carbon copy is routed to the Enforcement Administrator for review.

Client: City of Bryant

Sample Number: 38856-01

Sample Description:

Date Reported: 3/6/2013

Sample Location: effluent

Permit Number:

References: 40 CFR Part 136 Approved Methods, Containers, Preservation, Holding Times
 Standard Methods for the Examination of Water and Wastewater: EPA-600/4-79-020

Quality Control: Blank, duplication, known addition, quarterly analysis of external references samples

QA Frequency: Minimum of 10% Spikes and Duplicates

Parameter	Grab		Composite		Date/Time Received:	
	Date/Time	Sampler	Date/Time	Sampler	02/26/13 15:35	
	02/26/13 15:00					
Parameter	Reference	Test Date/Time	Initials	Result		
Ammonia Nitrogen						
Ammonia, NH3-N	4500-NH3,B,C			1.89 mg/l		
cBOD 5 day						
cBOD	5210 B			4.40 mg/l		
Chlorine Residual						
Chlorine residual	4500-Cl-G	2/26/2013 3:04:00 PM	MB	0.010 mg/l		
Dissolved Oxygen						
DO	4500-O c or g	2/26/2013 3:03:00 PM	MB	8.5 mg/l		
Fecal Coliform						
Fecal Coliforms	9222 D		MB	200 Col/100 mls		
Nitrite						
Nitrite	4500-NO2 B		MB	6.6 mg/l		
pH						
pH	4500-H+ B	2/26/2013 3:01:00 PM	MB	6.1 pH Units		
Total Phosphorus						
Phosphorus	EPA 365.2		MB	1.8 mg/l		
Total Suspended Solids						
TSS	2540 D			8.0 mg/l		

Client: City of Bryant

Sample Number: 38871-01

Sample Description:

Date Reported: 3/6/2013

Sample Location: effluent

Permit Number:

References: 40 CFR Part 136 Approved Methods, Containers, Preservation, Holding Times
 Standard Methods for the Examination of Water and Wastewater: EPA-600/4-79-020

Quality Control: Blank, duplication, known addition, quarterly analysis of external references samples

QA Frequency: Minimum of 10% Spikes and Duplicates

Grab	Composite	Date/Time Received:
Date/Time	Date/Time	02/27/13 15:50
Sampler	Sampler	
02/27/13 15:00		

Parameter	Reference	Test Date/Time	Initials	Result
Ammonia Nitrogen				
Ammonia, NH3-N	4500-NH3,B,C			0.37 mg/l
cBOD 5 day				
cBOD	5210 B			2.49 mg/l
Chlorine Residual				
Chlorine residual	4500-Cl-G	2/27/2013 3:04:00 PM	MB	0.030 mg/l
Dissolved Oxygen				
DO	4500-O c or g	2/27/2013 3:03:00 PM	MB	8.8 mg/l
Fecal Coliform				
Fecal Coliforms	9222 D		MB	40 Col/100 mls
Nitrite				
Nitrite	4500-NO2 B		MB	8.9 mg/l
pH				
pH	4500-H+ B	2/27/2013 3:01:00 PM	MB	6.3 pH Units
Total Phosphorus				
Phosphorus	EPA 365.2		MB	1.5 mg/l
Total Suspended Solids				
TSS	2540 D			7.0 mg/l

Client: City of Bryant

Sample Number: 38877-01

Sample Description:

Date Reported: 3/6/2013

Sample Location: effluent

Permit Number:

References: 40 CFR Part 136 Approved Methods, Containers, Preservation, Holding Times
 Standard Methods for the Examination of Water and Wastewater: EPA-600/4-79-020

Quality Control: Blank, duplication, known addition, quarterly analysis of external references samples

QA Frequency: Minimum of 10% Spikes and Duplicates

Date/Time	Grab Date/Time	Sampler	Composite Date/Time	Sampler	Date/Time Received: 02/28/13 15:45
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02/28/13 15:00

Parameter	Reference	Test Date/Time	Initials	Result
Ammonia Nitrogen				
Ammonia, NH3-N	4500-NH3,B,C			1.14 mg/l
cBOD 5 day				
cBOD	5210 B			3.66 mg/l
Chlorine Residual				
Chlorine residual	4500-Cl-G	2/28/2013 3:04:00 PM	MB	0.020 mg/l
Dissolved Oxygen				
DO	4500-O c or g	2/28/2013 3:03:00 PM	MB	9.0 mg/l
Fecal Coliform				
Fecal Coliforms	9222 D		MB	20 Col/100 mls
Nitrite				
Nitrite	4500-NO2 B		MB	9.1 mg/l
pH				
pH	4500-H+ B	2/28/2013 3:01:00 PM	MB	6.6 pH Units
Total Phosphorus				
Phosphorus	EPA 365.2		MB	1.5 mg/l
Total Suspended Solids				
TSS	2540 D			8.0 mg/l

June 26, 2013

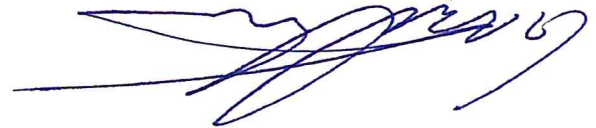
Arkansas Department of Environmental Quality
Attn. Enforcement Section
5301 Northshore Drive
North Little Rock, AR 72118-5317

Re: NPDES Permit No: AR0034002

City of Bryant Wastewater
1019 S.W. 2nd St.
Bryant, AR 72022

This is a letter that is explaining the resubmittal of the Discharge Monitoring Report for the month of March 2013. It was brought to my attention that the entries for Ammonia were incorrect. After reviewing my spread sheet of results for the analysis I discovered an error in entry of the data. Enclosed is an original and one copy of the corrected DMR.

If you have any questions regarding this matter please contact me at 501 943 0469.


Gregg Asher
City of Bryant
Wastewater Treatment Superintendent

NAME: BRYANT SEWAGE TREATMENT FACILITY
 ADDRESS: 210 SOUTHWEST 3RD STREET
 BRYANT, AR 72022

FACILITY: BRYANT SEWAGE TREATMENT FAC
 LOCATION: 1019 SW 2ND ST
 BRYANT, AR 72022
 ATTN: GREG ASHER, SUPERINTENDENT

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
 DISCHARGE MONITORING REPORT (DMR)

AR0034002	001-B
PERMIT NUMBER	DISCHARGE NUMBER
MM/DD/YYYY	MM/DD/YYYY
3/11/2013	3/11/2013

CORRECTED COPY

6/26/13

DMR Mailing ZIP CODE: 72022
 MAJOR 5

001-MONTHLY-TRTD MUNICIPAL WW
 External Outfall

No Discharge

PARAMETER	SAMPLE MEASUREMENT	QUANTITY OR LOADING			QUALITY OR CONCENTRATION			NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE
		VALUE	UNITS	REQ. MON. MO AVG	REQ. MON. DAILY MAX	MGD	VALUE			
Oxygen, dissolved (DO)	MEASUREMENT	8.73	mg/L	2.43	3.06	0	0	3/7	GRAB	
00300 1 1	PERMIT REQUIREMENT	6	MO AVMN	Three Per Week	GRAB	
Effluent Gross	SAMPLE MEASUREMENT	6.4	3/7	GRAB	
pH	PERMIT REQUIREMENT	6	MINIMUM	Three Per Week	GRAB	
00400 1 0	PERMIT REQUIREMENT	Three Per Week	GRAB	
Effluent Gross	SAMPLE MEASUREMENT	108.6	lbs/dy	3/7	GRAB	
Solids, total suspended	PERMIT REQUIREMENT	376.3	lb/d	Three Per Week	COMP-6	
00530 1 0	PERMIT REQUIREMENT	150.1	MO AVG	Three Per Week	COMP-6	
Effluent Gross	SAMPLE MEASUREMENT	10.62	lbs/dy	3/7	COMP-6	
Nitrogen, ammonia total (as N)	PERMIT REQUIREMENT	Three Per Week	COMP-6	
00610 1 1	PERMIT REQUIREMENT	Three Per Week	GRAB	
Effluent Gross	SAMPLE MEASUREMENT	Three Per Week	GRAB	
Infinite plus nitrate total 1 det. (as N)	PERMIT REQUIREMENT	Three Per Week	GRAB	
00630 1 0	PERMIT REQUIREMENT	Three Per Week	GRAB	
Effluent Gross	SAMPLE MEASUREMENT	Three Per Week	GRAB	
Phosphorus, total (as P)	PERMIT REQUIREMENT	Three Per Week	GRAB	
00665 1 0	PERMIT REQUIREMENT	Three Per Week	GRAB	
Effluent Gross	SAMPLE MEASUREMENT	2.125	MGD	31/31	TOTALZ	
Flow, in conduit or thru treatment plant	PERMIT REQUIREMENT	3.038	DAILY MAX	Daily	TOTALZ	
50050 1 0	PERMIT REQUIREMENT	TOTALZ	
Effluent Gross	PERMIT REQUIREMENT	TOTALZ	

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER

Jill Dabbs, Mayor

501 943 0469

6/26/13

TELEPHONE DATE

MMDDYYYY

COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)
 REPORT FLOW AS MONTHLY AVG. & DAILY MAX. IN MILLION GALLONS/DAY. SEE PART II, CONDITION #9, SEE PART IV, ITEM 27(A). 63-00065

PERMITTEE NAME/ADDRESS (Include Facility Name/Location if Different)
 NAME: BRYANT SEWAGE TREATMENT FACILITY
 ADDRESS: 210 SOUTHWEST 3RD STREET
 BRYANT, AR 72022

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
 DISCHARGE MONITORING REPORT (DMR)

AR0034002
 PERMIT NUMBER

MM/DD/YYYY
 3/1/2013

001-B
 DISCHARGE NUMBER

MM/DD/YYYY
 3/31/2013

FACILITY: BRYANT SEWAGE TREATMENT FAC
 LOCATION: 1019 SW 2ND ST
 BRYANT, AR 72022

ATTN: GREG ASHER, SUPERINTENDENT

CORRECTED COPY

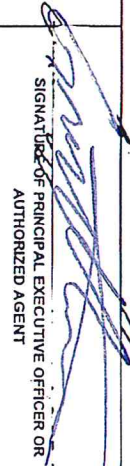
Form Approved
 OMB No. 2040-0004

6/26/13
 DMR Mailing ZIP CODE: 72022
 MAJOR \$

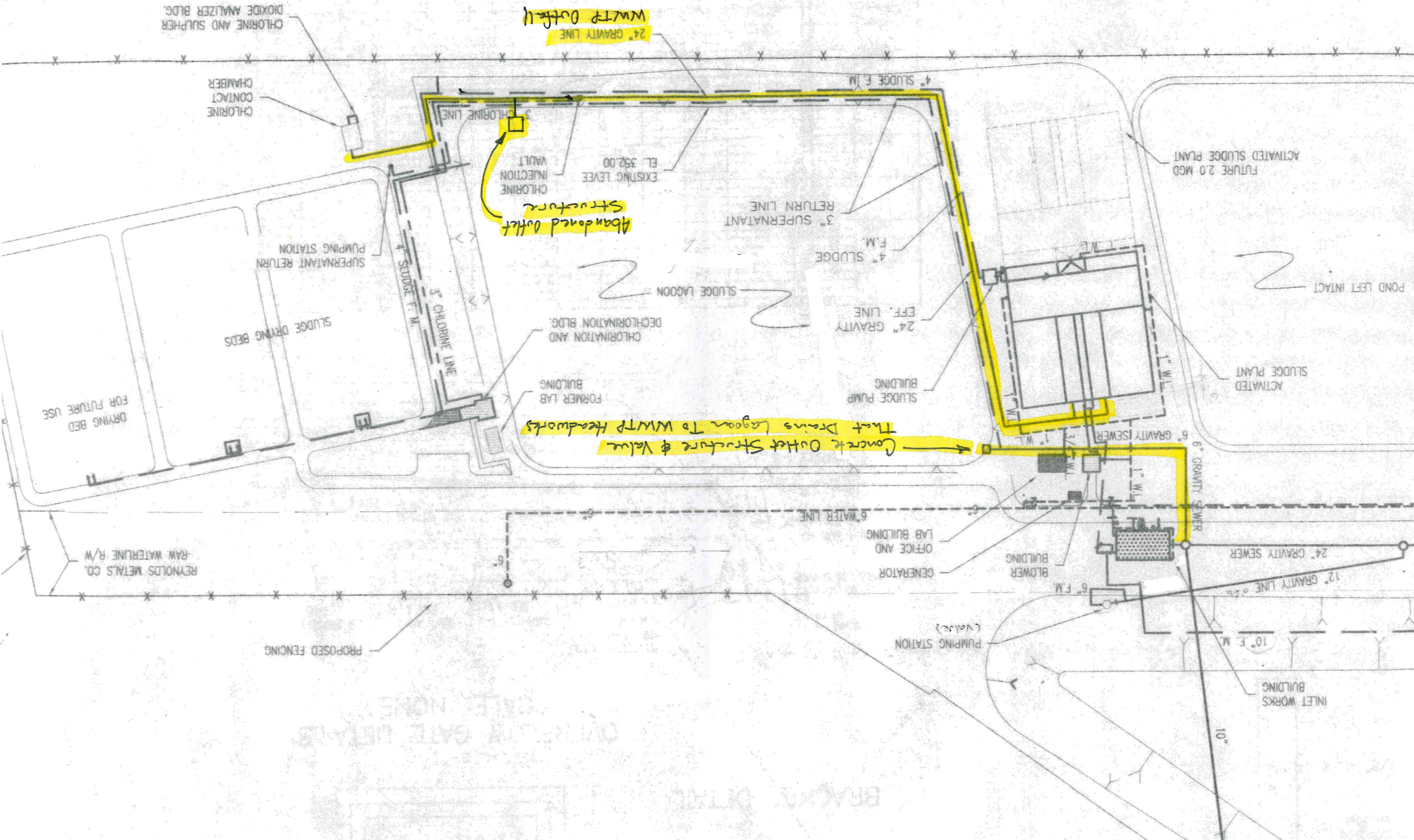
001-MONTHLY-TRTD MUNICIPAL WW
 External Outfall

No Discharge

PARAMETER	SAMPLE MEASUREMENT	QUANTITY OR LOADING			QUALITY OR CONCENTRATION			NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE
		VALUE	UNITS	PERMIT REQUIREMENT	VALUE	UNITS	PERMIT REQUIREMENT			
Chlorine, total residual	MEASUREMENT	*****	*****	*****	*****	*****	*****	0	3/7	GRAB
50060 1 0 Effluent Gross	PERMIT REQUIREMENT	*****	*****	*****	*****	*****	*****	0	Three Per Week	GRAB
Coliform, fecal general	SAMPLE MEASUREMENT	*****	*****	*****	*****	*****	*****	0	3/7	GRAB
74055 1 0 Effluent Gross	PERMIT REQUIREMENT	*****	*****	*****	*****	*****	*****	0	Three Per Week	GRAB
BOD, carbonaceous, 05 day, 20 C	SAMPLE MEASUREMENT	46.98	lbs/dy	*****	3.07	mg/l	*****	0	3/7	COMP6
80062 1 0 Effluent Gross	PERMIT REQUIREMENT	2502 MO AVG	lbs/dy	*****	3.07 MO AVG	mg/l	*****	0	Three Per Week	COMP6

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER	I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather, and evaluate the information submitted. Based on my knowledge and belief, the information submitted is true and complete, and I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.		TELEPHONE	DATE
Jill Dabbs, Mayor			501 943 0469	6/26/13
TYPED OR PRINTED	SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT		AREA CODE NUMBER	MM/DD/YYYY

COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)
 REPORT FLOW AS MONTHLY AVG. & DAILY MAX. IN MILLION GALLONS/DAY. SEE PART II, CONDITION #9. SEE PART IV, ITEM 27(A). 63-00065



ADEQ

ARKANSAS
Department of Environmental Quality

July 18, 2013

Honorable Jill Dabbs
Mayor, City of Bryant
1019 Southwest 2nd Street
Bryant, AR 72022

RE: Compliance Inspection
AFIN: 63-00065; NPDES Permit No.: AR0034002

Dear Mayor Dabbs:

The Department is in receipt of a letter submitted on behalf of the City of Bryant by Crist Engineers and dated June 28, 2013 pertaining to the May 2 and 3, 2013 inspection of the above referenced facility. The Department has the following comments regarding the response. Specifically:

- 1) The letter dated June 28, 2013 was not signed by the Responsible Official on record for NPDES Permit No: AR0034002.
- 2) Regarding the request to decommission the sludge lagoon outfall structure, it is necessary to submit a formal plan to the ADEQ Water Division Permits Branch complete with drawings to illustrate exactly how the City proposes to close the outfall. This plan is required to include a specific date by which the outfall structure will be decommissioned. Kimberly A. Fuller, P.E. NPDES Engineer Supervisor, ADEQ Water Division, can be contacted at (501) 682-0643 for additional information.
- 3) A date by which the vegetation will be removed from within the sludge lagoon and around the embankments is required to be submitted in response to this inspection report.

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 Water-Inspection-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 documentation (i.e. photos) is due by **August 2, 2013**. If I can be of any assistance, please contact me 501-682-0658 or parkerr@adeq.state.ar.us.

Sincerely,



Risa Parker
District 9 Field Inspector
Water Division

cc: Kimberley A. Fuller, P.E.; Permits Branch

ADEQ

ARKANSAS
Department of Environmental Quality

Front Desk Hand Delivery Receipt

Date 7/30/13

Sender

RECEIVED


JUL 30 2013

12:10

Received

By





City of Bryant

210 S.W. 3rd Street
Bryant, Arkansas 72022

(501) 847-5559
Fax (501) 847-5332
www.cityofbryant.org

July 29, 2013

Ms. Risa Parker
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, Arkansas 72118

Re: Response to Compliance Inspection Letter Dated July 18, 2013
AFIN: 63-00065; NPDES Permit No.: AR0034002
Bryant, Arkansas

Dear Ms. Parker:

The following are in response to your comments dated July 18, 2013 concerning the above referenced permits.

1. A copy of the letter that was sent to ADEQ dated June 28, 2013 has been signed by the Responsible Official and is attached.
2. A formal plan has been submitted to ADEQ. A copy of the plan is attached. The structure will be decommissioned within 60 days of approval of the formal plan.
3. The City of Bryant has already sprayed the vegetative growth that was observed along the lagoon embankments within the sludge storage lagoon with a herbicide in order to kill the vegetation. The vegetation in the matted area will be sprayed by August 30th if the matted area is allowed to remain in the sludge lagoon. The vegetation will be monitored and sprayed with a herbicide so that all vegetative growth is killed. The City of Bryant is currently in the design phase of constructing a sludge dewatering facility. It is estimated that the sludge dewatering facility will be complete in approximately 3 years. If the matted area is required to be removed, the City of Bryant prefers to wait until the sludge dewatering facility is complete before plans and specifications are prepared to remove accumulated sludge in the lagoon.

Please contact me if you have any questions or need additional information.

Sincerely,



Monty Ledbetter
City of Bryant, Arkansas





City of Bryant

210 S.W. 3rd Street
Bryant, Arkansas 72022

(501) 847-5559
Fax (501) 847-5332
www.cityofbryant.org

July 25, 2013

Ms. Risa Parker
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, Arkansas 72118

Re: Response to Compliance Inspection Letter Dated May 16, 2013
AFIN: 63-00065; NPDES Permit No.: AR0034002
No Exposure Certification ARR00C408
Bryant, Arkansas

Dear Ms. Parker:


The following are in response to your comments dated May 2, 2013 concerning the above referenced permits.

AR0034002

1. Currently there is a concrete outlet structure with drain piping and a valve that is connected to the 24-inch outfall from the wastewater plant (see attached drawing). The sludge lagoon outfall structure and drain pipe are no longer used. The City of Bryant has submitted a plan to ADEQ to decommission the structure and drain pipe; however, due to the location and depth of the pipe, the City has not been able to safely excavate the drain piping in order to remove the valve and a section of pipe. The City is requesting approval to modify the plan as follows:

- a. Block off the outlet piping inside the concrete outlet structure, remove the grate at the top of the structure, and pour a concrete cap at the top of the structure. This method would prevent excavation of the sludge lagoon levee and would be a much safer alternative.
- b. Remove the valve box and fill the void with dirt to prevent access to the valve.

2. The water level in the sludge lagoon is maintained using the outlet structure in the northeast corner of the sludge lagoon and a staff gauge at the lowest point in the levee. Sludge decant drains through the structure to the inlet works building wetwell and back through the treatment plant (see attached drawing). At the time of the inspection, construction activity at the wastewater treatment plant included work in the inlet works building wetwell and the equalization basin so they were not in service. Since the compliance inspection, the inlet works building wetwell has been returned to service and the two feet of freeboard has been achieved. The City of Bryant will inform all haulers that piping and hoses from trucks shall not have any leaks, holes, etc.



3. The City of Bryant will spray the vegetative growth that was observed on the matted area and along the lagoon embankments within the sludge storage lagoon with a herbicide in order to kill the vegetation.

4. According to the ADEQ NPDES Reporting Requirements Handbook dated September 13, 2004, item 3 on page 22 and 23 (see attached), "the 7-day average must be reported in the month that the Saturday falls in. For example, May 1, 1999 is a Saturday. Samples collected from April 25 through May 1, 1999, should be averaged and reported as a 7 day average during the month of May since the Saturday of the week falls in May." For March 2013, the CBOD5 samples collected on February 26th, 27th, and 28th, were reported on the March DMR since the Saturday of the week was in March (March 2nd). Using this method, the CBOD5 7-day average for March should be 3.51 mg/l as reported on the March DMR and not 3.24 mg/l as shown in your calculations. For Ammonia Nitrogen the operator input the wrong test result for March 5, 2013 into their spreadsheet therefore giving incorrect DMR values. The operator input 6.44 mg/l for Ammonia Nitrogen and he should have input 0.44 mg/l. Using the correct value of 0.44 mg/l results in a corrected monthly average value of 10.62 lbs/day and not 18.47 lbs/day as reported (see attached). The City of Bryant will submit corrected DMR's to ADEQ (see attached). Please note that the error for Ammonia Nitrogen resulted in a higher reported value of 18.47 lbs/day than the actual value of 10.62 lbs/day that should have been reported and neither value exceeded the NPDES permit limit.

ARR00C408

1. The solids have been removed and placed in the sand drying beds.

ARR150000

1. A stormwater pollution prevention plan and Notice of Coverage has been posted at the site.

Please contact me if you have any questions or need additional information.

Sincerely,



Jill Dabbs, Mayor
City of Bryant, Arkansas

cc: Monty Ledbetter



City of Bryant

210 S.W. 3rd Street
Bryant, Arkansas 72022

(501) 847-5559
Fax (501) 847-5332
www.cityofbryant.org

July 29, 2013

Ms. Kimberly Fuller, P.E.
NPDES Engineer Supervisor
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, Arkansas 72118

Re: Plan to Decommission Sludge Storage Lagoon Outfall Structure
NPDES Permit No.: AR0034002
Bryant, Arkansas

Dear Ms. Fuller:

Upon request by Risa Parker (District 9 Field Inspector), the following plan to decommission the outfall from the sludge storage lagoon is hereby presented for review and approval.

Currently there is a concrete outlet structure with drain piping and a valve that is connected to the 24-inch outfall from the wastewater plant. The City of Bryant has previously submitted a plan to ADEQ to decommission the structure and drain pipe; however, due to the location and depth of the pipe, the City has not been able to safely excavate the drain piping in order to remove the valve and a section of pipe. The City is requesting approval to modify the plan as follows:

1. Remove the grate at the top of the structure.
2. Block off the outlet piping inside the concrete outlet structure or fill it with concrete.
3. Fill the structure with flowable fill or concrete to the top of the structure. This method would prevent excavation of the sludge lagoon levee and would be a much safer alternative.
4. Close the valve(s), remove the valve box(es) and fill the void(s) with dirt to prevent access to the valve.


The City of Bryant will decommission the structure within 60 days of receiving ADEQ approval of this formal plan.

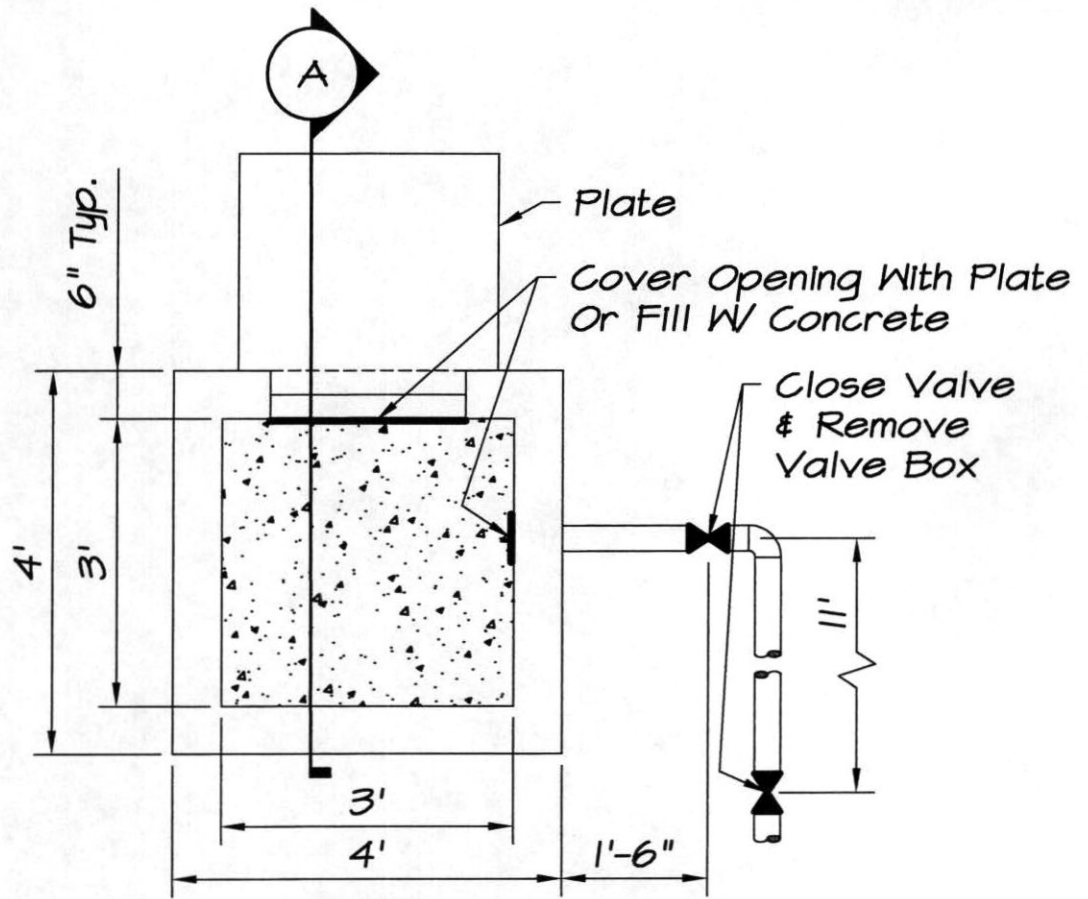
Please contact me if you have any questions or need additional information.

Sincerely,



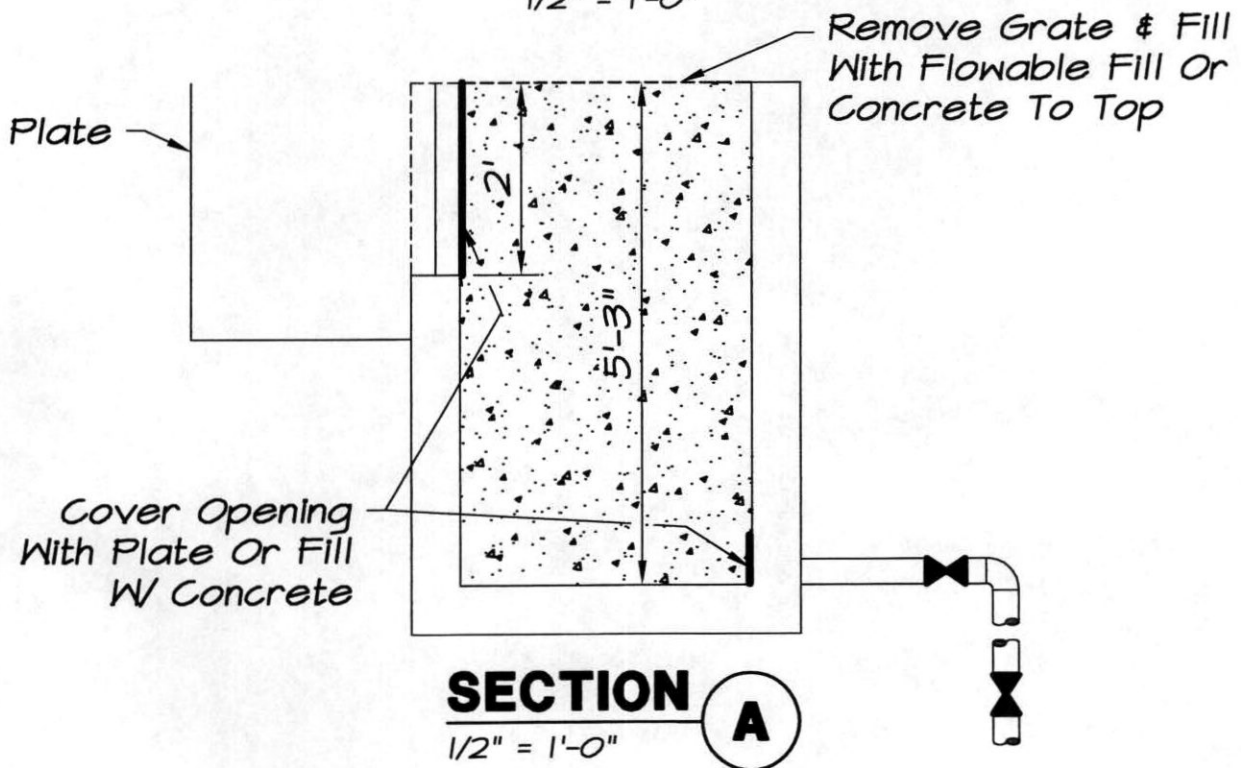
Monty Ledbetter
City of Bryant, Arkansas





PLAN

1/2" = 1'-0"



SECTION

1/2" = 1'-0"



**FIGURE 1
DECOMMISSIONING OF SLUDGE
LAGOON OUTLET STRUCTURE**

Bolenbaugh, Jason

From: Parker, Risa
Sent: Tuesday, October 01, 2013 2:07 PM
To: Bolenbaugh, Jason
Subject: FW: AR0034002 - Bryant, AR - Decommissioning Sludge Storage Lagoon Outfall Structure
Attachments: 20130930080542.pdf

Please add to Water ID 11343.

From: Les Price [<mailto:lprice@crisengineers.com>]
Sent: Monday, September 30, 2013 10:12 AM
To: Randall, Christopher; Parker, Risa
Cc: mledbetter@cityofbryant.com
Subject: AR0034002 - Bryant, AR - Decommissioning Sludge Storage Lagoon Outfall Structure

Chris and Risa,

See attached letter from Monty. We will mail the original in today's mail.

Thanks,

Les Price
Crist Engineers, Inc.
1405 North Pierce, Suite 301
Little Rock, AR 72207
Phone: 501-664-1552
Fax: 501-664-8579
lprice@crisengineers.com
www.crisengineers.com





City of Bryant

210 S.W. 3rd Street
Bryant, Arkansas 72022

(501) 847-5559
Fax (501) 847-5332
www.cityofbryant.org

September 24, 2013

Mr. Chris Randall
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, Arkansas 72118

Re: Decommissioning Sludge Storage Lagoon Outfall Structure
NPDES Permit No.: AR0034002
Bryant, Arkansas

Dear Mr. Randall:

In accordance with the "Plan to Decommission the Sludge Storage Lagoon Outfall Structure" dated July 29, 2013 and in response to your letter dated August 15, 2013, the City of Bryant has decommissioned the outfall from the sludge storage lagoon.

The grate at the top of the structure was removed, and the piping and structure was filled with concrete to the top of the structure. The valve boxes were removed and the voids were filled with dirt. I have attached some photos of the structure.

Please contact me if you have any questions or need additional information.

Sincerely,

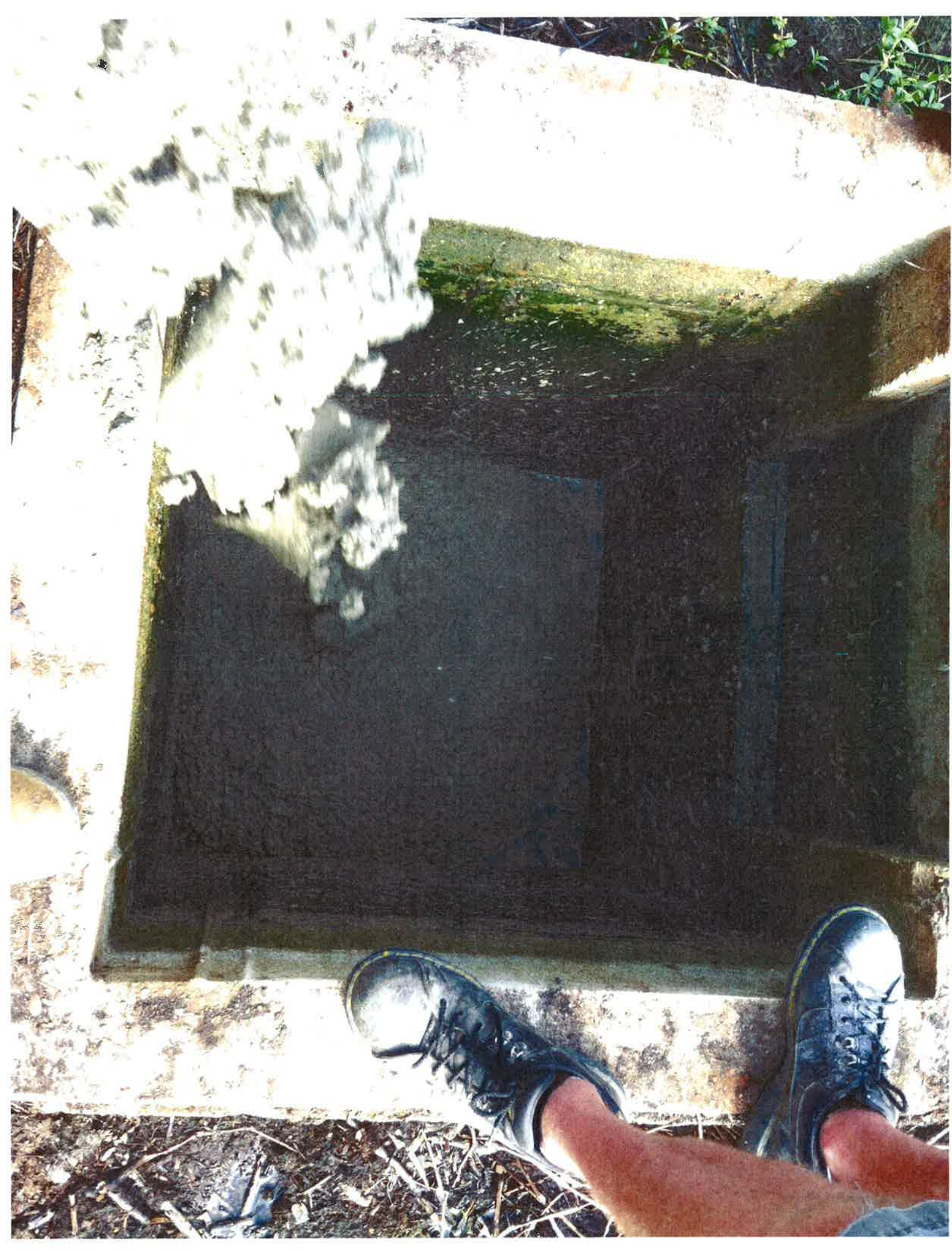
Monty Ledbetter
City of Bryant, Arkansas











ADEQ

ARKANSAS
Department of Environmental Quality

October 4, 2013

Honorable Jill Dabbs
Mayor, City of Bryant
1019 Southwest 2nd Street
Bryant, AR 72022

RE: Compliance Inspection
AFIN: 63-00065; NPDES Permit No.: AR0034002

Dear Mayor Dabbs:

The Department is in receipt of a letter dated September 24, 2013 regarding the May 2-3, 2013 inspections of the above-referenced 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 501-682-0658 or you may e-mail me at parkerr@adeq.state.ar.us.

Sincerely,



Risa Parker
District 9 Field Inspector
Water Division