

December 13, 2013

Terry McGinister, General Manager Helena Municipal Water and Sewer 702 Cherry Street Helena, Arkansas 72342

RE: Compliance Inspections (Phillips Co) AFIN: 54-00083 NPDES Permit No.: AR0043389 AR0043389 (SSO)

ARR00C436

Dear Mr. McGinister:

On December 11, 2013, I conducted compliance inspections in response to a complaint of the wastewater treatment facility and the sanitary sewer collection system in accordance with the provisions of the Federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, and the regulations promulgated thereunder. This inspection revealed the following violation:

Compliance Evaluation Inspection AR0043389

No violations noted during inspection.

Sanitary Sewer Overflow (SSO) Inspection AR0043389

Part II, #4; Failure to report sanitary sewer overflows. Specifically, the two overflows that occurred on July 29, 2013 and August 12, 2013. The monthly SSO form for the months of July 2013 and August 2013 should be resubmitted to document these occurrences.

Industrial Stormwater Compliance Inspection ARR00C436

No violations noted during the inspection.

The above item requires your immediate attention. Please submit a written response to Water Division Inspection Branch of this Department. The response should be mailed to the address below or e-mailed to <u>Water-Inspection-Report@adeq.state.ar.us</u>. The response should contain documentation describing the course of action taken to correct each item noted. The corrective action should be completed as soon as possible and the written response is due by <u>December 27, 2013.</u>

Terry McGinister, General Manager Helena Municipal Water and Sewer Page 2

If I can be of any assistance, please contact me at (870) 247-5155 or e-mail at henderson@adeq.state.ar.us.

Sincerely,

Steven L. Houderson

Steven L. Henderson District 6 Field Inspector Water Division

€EPA					Form Approved OMB No. 2040-0003		
UNITED STATES EN							
NPDES Compl							
F	-		-				
Section A: National Data System Coding Transaction Code Yr/Mo/Day Inspector Fac. Type 1 N 2 5 3 A R 0 0 4 3 3 8 9 11 12 1 3 1 2 1 1 17 18 C 19 S 20 1							
	uation Rating 1 3 71	BI N 72	QA	R	eserved 80		
	Section I	B: Facility	7 Data				
Name and Location of Facility Inspected (For industrial u include POTW name and NPDES permit number) City of Helena WWTP	sers discharging to POTW	7, also	Entry Time/Date 9:00 a.m. 12/11/2013		Permit Effective Date November 1, 2009		
Approximately 1.5 miles West of the Hwy. 44 and Hwy Section 24, Township 2 South, Range 4 East Phillips County, Arkansas	Exit Time/Date 12:00 noon 12/11/2013		Permit Expiration Date October 31, 2014				
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)Other Facility DataBenzene Collier, Class III Operator(870) 338-7438							
Name, Address of Responsible Official/Title/Phone and F. Terry McGinister, General Manager (870) 338-7 Helena Municipal Water and Sewer 702 Cheery Street Helena, Arkansas 72342	Contacted W Yes No Ma		acility Location: 34 30' 00" 7 90 38' 07" Iajor Municipal DS# 075168				
(S = Sa	Section C: Areas Ev tisfactory, M = Marginal.		During Inspection tisfactory, N = Not Evaluated)				
a	surement	a	perations & Maintenance	S	Sampling		
S Records/Reports S Self-Mon	itoring Program	S SI	udge Handling/Disposal	Ν	Pollution Prevention		
S Facility Site Review N Complian	ce Schedules	N Pr	retreatment	Ν	Multimedia		
S Effluent/Receiving Waters S Laborato	•	N St		Other:			
Section D: Summary of Findings/Comments (Attach additional sheets if necessary)							
A routine inspection was conducted to determine compliance status with the Arkansas Water and Air Pollution Control Act, the Federal Clean Water Act and the regulations promulgated thereunder. At the time of inspection, the facility appeared to be in compliance with the applicable regulations.							
Name(s) and Signature(s) of Inspector(s) Agency/Office/Telephone/Fax Date Struct A backback Steven L. Henderson Date							
Signature of Reviewer Agency/Office/Phone and Fax Numbers Date Icorri M ^c Cube Date December 13, 2013							

ADEQ Water NPDES Inspection

Permit #: AR0043389

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:	
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	
DETAILS:	
1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS:	
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE:	🗹 s 🗆 m 🗇 u 🖾 na 🖾 ne
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:	OS OM OU ONA ØNE
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR:	Øs 🗆m 🗇u 🖾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	
DETAILS:	
1. TREATMENT UNITS PROPERLY OPERATED:	Øs 🗆m 🗇u 🖾na 🗇ne
2. TREATMENT UNITS PROPERLY MAINTAINED:	Øs 🗆m 🗇u 🖾na 🖾ne
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED:	Øs 🗆m 🗇u 🖾na 🖾ne
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE:	Øs 🗆 🗇 🖓 NA 🕬 NE
5. ALL NEEDED TREATMENT UNITS IN SERVICE:	
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED: 1Class III, 1 Class II	Øs 🗆m 🗇u 🖾na 🖾ne
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED:	OS OM OU ØNA ONE
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:	

SE	ECTION D: SAMPLING	
PE	ERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS	
DE	TAILS:	
1.	SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT:	
2.	LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES:	
3.	FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT:	🗹 Y 🗆 N 🗆 NA 🗆 NE
4.	SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT:	
5.	SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT:	
6.	SAMPLE COLLECTION PROCEDURES ADEQUATE:	
a	. SAMPLES REFRIGERATED DURING COMPOSITING:	
b	. PROPER PRESERVATION TECHNIQUES USED:	🗹 Y 🗆 N 🗆 NA 🗆 NE
С	. 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:	
SE	ECTION E: FLOW MEASUREMENT	
PE	RMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS	
DE	ETAILS:	
1.	PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: TYPE OF DEVICE: 4' Rectangular We	
2.	FLOW MEASURED AT EACH OUTFALL AS REQUIRED:	
3.	SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED:	
4.	CALIBRATION FREQUENCY ADEQUATE: Last calibration: January 2013	Øy 🛛 n 🖓 na 🖓 ne
5.	RECORDS MAINTAINED OF CALIBRATION PROCEDURES:	Øy 🗅n 🗇na 🗇ne
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:	Øy 🛛 n 🖓 na 🖓 ne
SE	ECTION F: LABORATORY	
PE	RMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS	
DE	ETAILS:	
1.	EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(B) FOR SLUDGES) :	Øy 🗅n 🗇na 🗇ne
2.	IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED:	
3.	SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT:	
4.	QUALITY CONTROL PROCEDURES ADEQUATE:	Øy 🗆n 🗆na 🗇ne
5.	DUPLICATE SAMPLES ARE ANALYZED >10% OF THE TIME:	Øy 🗆n 🗆na 🗇ne
6.	SPIKED SAMPLES ARE ANALYZED \geq 10% OF THE TIME:	Øy 🗆n 🗆na 🗇ne
7.	COMMERCIAL LABORATORY USED:	Øy 🗆n 🗆na 🗇ne
a	. LAB NAME: McClelland Consulting Engineers, Inc.	
b	. LAB ADDRESS: 1311 West 2 nd Street, Little Rock, Arkansas 72201	
С	. PARAMETERS PERFORMED: BOD5, TSS, FCB, pH, Acute Bio-monitoring	
8.	BIOMONITORING PROCEDURES ADEQUATE:	
а	. PROPER ORGANISMS USED:	
b	. PROPER DILUTION SERIES FOLLOWED:	
с	. PROPER TEST METHODS AND DURATION:	
d	. RETESTS AND/OR TRE PERFORMED AS REQUIRED:	Øy 🛛 n 🖾 na 🖾 ne

	NPDES Inspection
ADEQ water	INPDES Inspection

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SECTION G: EFFLUENT/RECEIVING WATERS OBSERVATIONS											
BASED ON VISUAL OBSERVATIONS ONLY											
DETAILS:											
OUTFALL #:	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	ATING SOLIDS COLOR OTHER					
001	none	none	none	none	none	Clear	none				
		•			•	•					
SECTION	H: SLUDGE	DISPOSAL									
SLUDGE D	DISPOSAL MEI	ETS PERMIT F	REQUIREMEN	ГS		Øs ⊡m [
DETAILS:											
1. SLUDGE M	ANAGEMENT ADEQU	ATE TO MAINTAIN EF	FLUENT QUALITY:			Øs 🗆					
2. SLUDGE R	ECORDS MAINTAINE	D AS REQUIRED BY 40) CFR 503:			🗆 s 🗆	M 🗆 U 🗹 NA 🗆 NE				
3. FOR LAND	APPLIED SLUDGE, T	YPE OF LAND APPLIEI	D TO: (E.G., FOREST,	AGRICULTURAL, PUE	BLIC CONTACT SITE):						
SECTION	I: SAMPLIN	G INSPECTIO	ON PROCEDU	JRES							
SAMPLE R	RESULTS WITH	HIN PERMIT R	EQUIREMENT	S		□s □m [
DETAILS:											
1. SAMPLES	OBTAINED THIS INSP	ECTION:					Y 🗆 N 🗆 NA 🖉 NE				
2. TYPE OF S	AMPLE: GRAB:		IETHOD: FREQUE	NCY:							
3. SAMPLES	PRESERVED:						Y 🗆 N 🗆 NA 🗹 NE				
4. FLOW PRC											
5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE:							Y 🗆 N 🗆 NA 🖉 NE				
6. SAMPLE R	EPRESENTATIVE OF	VOLUME AND NATUR	E OF DISCHARGE:				Y 🗆 N 🗆 NA 🗹 NE				
7. SAMPLE SI	PLIT WITH PERMITTE	E:					Y 🗆 N 🗆 NA 🖉 NE				
8. CHAIN-OF-	CUSTODY PROCEDU	RES EMPLOYED:					Y 🗆 N 🗆 NA 🖾 NE				
9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT:							Y 🗆 N 🗆 NA 🗹 NE				
SECTION	J: STORM W	NATER POLL	UTION PREV	/ENTION PL/	AN						
STORM W	ATER MANAG	EMENT MEET	S PERMIT RE	QUIREMENTS		□s □m [
DETAILS:					·						
1. SWPPP UP	DATED AS NEEDED:	DATE OF LAST UP	DATE:				y 🗆n 🗹na 🗆ne				
					Y 🗆 N 🗹 NA 🗆 NE						
3. POLLUTION	N PREVENTION TEAM	I IDENTIFIED:					Y 🗆 N 🗹 NA 🗆 NE				
					Y 🗆 N 🗹 NA 🗆 NE						
						Y 🗆 N 🗹 NA 🗆 NE					
6. LIST OF PC							Y ON ØNA ONE				
7. ALL NON-S	TORM WATER DISCH	IARGES ARE AUTHOR	IZED:				Y ON ØNA ONE				
8. LIST OF STRUCTURAL BMPS:						Y DN ØNA DNE					
9. LIST OF NON-STRUCTURAL BMPS:											
10. BMPS PROPERLY OPERATED AND MAINTAINED:											
11. INSPECTIC	ONS CONDUCTED AS	REQUIRED:					Y 🗆 N 🗹 NA 🖉 NE				

	ADEQ Water NPDES Inspe	ction
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Permit #: AR0043389

FLOW CALCULATION SHEET							
Date: 12/11/2013 Time: 10:00 a.m.							
Head in Inches: 3.5 Feet: .29							
Type & Size of Primary Flow Measurement Device:							
4' Rectangular Weir W/O End Contractions							
Name & Model of Secondary Flow Measurement De	evice:						
Milltronics Hydro Ranger							
Date of last Calibration of Secondary Flow Device: J	anuary 2013						
	-						
Recorded Flow at Date & Time Listed Above: 958.	8 gpm (Facility Flow Meter)						
Calculated Flow at Date & Time Listed Above: 933	3.6 apm						
Calculated Flow at Date & Time Listed Above: 933.6 gpm (Flow is calculated using flow charts in: ISCO Open Channel Flow Measurement Handbook-5 th Edition)							
% Error = Recorded Value - Calculated Value	X 100						
Calculated Value							
958.8 - 933.6							
$\% \text{ Error} = \begin{array}{ c c c } 958.8 & - & 933.6 \\ \hline 933.6 \\ \hline \end{array}$	— X 100						
955.0							
25.2 X 400							
% Error = $\frac{23.2}{933.6}$ X 100							
% Error = 0.026 X 100							
% Error = 2.69% %							
Comments:							

ADEQ Water NPDES	ADEQ Water NPDES Inspection AFIN: 54-0008			Permit #: AR0043389					
DMR Calculation Check									
Reporting Period:	From		10	01	_ To	2013	10	31	
		Year	Month	Day		Year	Month	Day	
Parameter Checked	: <u>BC</u>	DD 5-day	_						
]	Loading			Concentration				
		Mass				Mor	nthly		
	Mo. A	Mo. Avg lbs/day			vg	mg/l	7-day Avg	g mg/l	
Reported Value:		126.9		16.4			20.2		
Calculated Value:		126.9		16.4			20.2		
Permit Value:		354		30			45		

If calculated value does not equal reported value, explain: <u>EQUAL</u>