



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	0	0	2	1	7	7	6	11	12	1	3	1	2	0	4	17	18	P	19	S	20	1	
Remarks																													
Inspection Work Days						Facility Evaluation Rating						BI		QA		Reserved													
67						69	70	N						71	N	72	N	73											80

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number)		Entry Time /Date		Permit Effective Date	
City of Nashville Hwy 27 ~ 1/2 mile south of town		1104 / 12-4-2013		February 1, 2009	
		Exit Time/Date		Permit Expiration Date	
		1342 / 12-4-2013		January 31, 2014	
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)				Other Facility Data	
Ed Carlyle, Jr. / Pretreatment Coordinator / (870) 845-7402				PCI	
Name, Address of Responsible Official/Title/Phone and Fax Number				Contacted	
Larry Dunaway / Public Works Director / (870) 845-4015 426 North Main Street Nashville, AR 71852				Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
				PDS# 075296	

Section C: Areas Evaluated During Inspection

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

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

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

See attached report.

Name(s) and Signature(s) of Inspector(s)		Agency/Office/Telephone/Fax		Date	
Shan Lynch <i>Shan Lynch</i>		ADEQ / Dist. 7 / 870 389-6970		December 16, 2013	
Signature of Reviewer		Agency/Office/Phone and Fax Numbers		Date	
Kerri McCabe <i>Kerri McCabe</i>		ADEQ / NLR / 501-682-0642		December 27, 2013	

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY
PRETREATMENT COMPLIANCE INSPECTION (PCI) REPORT

Name of Municipality: City of Nashville

AFIN Number: 31-00036

NPDES Permit Number(s): AR0021776

Program Tracked under NPDES Permit Number: AR0021776

Fact Sheet Preparation Date: NA

Date of Last PCI/Audit: Audit / February 22 - 24, 2012

Date of Last Annual Report: NA

Name of Inspector: Shan Lynch

Date PCI Performed: December 4, 2013

Name, Title, and Telephone Number of Facility Representative:

Ed Carlyle, Jr. / Pretreatment Coordinator / (870) 845-7402

Name and Title of Other Participants: None

Number of IUs Visited: 0

Name(s) of IUs Visited: _____

AN IU SITE VISIT FORM SHOULD BE COMPLETED FOR EACH IU VISITED

NOTE: ANY QUESTION PRINTED IN ALL CAPS AND BOLD PRINT INDICATED A REGULATORY REQUIREMENT AND MUST BE ANSWERED FOR THE PCI REPORT TO BE COMPLETE. A NO ANSWER TO ONE OF THESE QUESTIONS SHOULD RESULT IN AN UNSATISFACTORY RATING.

Form approved July 1989

A. INDUSTRIAL USER SURVEY

1. List any Significant Industrial Users (SIUs) which have been added or deleted from the program since the last audit or inspection. Aero has been deleted from the program. This facility went bankrupt and is shut down and vacant.

2. Has ADEQ or EPA been notified of these changes? Yes

3. HAS THE INDUSTRIAL USER SURVEY BEEN KEPT UPDATED? yes

4. What procedures are being used to update the IU Survey? Water dept. notifies of new connections; newspaper; city council meetings; manhole inspections; phone book listings; city personnel; city plumbing inspector

5. Total number of Significant Industrial Users, according to the definition used by the POTW. (This number must be greater than or equal to the answer to question 6) 1

6. Number of Categorical Industrial Users: 1

7. How does the POTW determine the appropriate categorical standards to apply to an IU? Federal regulations

8. List all categorical IUs discharging under the approved (such program. Include the name of the IU, the regulatory category as Metal Finishing), and the regulated process (phosphating, zinc plating, etc.) Additional listings can be made in the comments section if necessary.

Name of IU:	Category:	Regulated Process:
Jan-Eze Plating	Metal finisher	Polishing, plating

B. LOCAL LIMITS

1. IS THE POTW APPLYING LOCAL LIMITS WHICH HAVE BEEN APPROVED BY ADEQ OR EPA? No, facility using categorical limits. A completed TRE from CEA (Civil Engineering Associates) and is awaiting Local Limit determination from ADEQ.

2. Describe any apparent problems with the local limits.
none

3. How often are pollutant scans of POTW influent, effluent, and sludge performed by the POTW? Does this fulfill the requirements of the approved program (as described in the fact sheet) and part III of the NPDES permit?

Pollutant:	Frequency:	Requirement in		Comments:
		Permit:	Program:	
Metals:				
Influent:	<u>4 / year</u>	<u>4 / year</u>	<u>quarterly</u>	
Effluent:	<u>4 / year</u>	<u>4 / year</u>	<u>quarterly</u>	
Sludge:	<u>none</u>	<u>none</u>	<u>none</u>	
Organics:				
Influent:	<u>1 / year</u>	<u>1 / year</u>	<u>yearly</u>	
Effluent:	<u>1 / year</u>	<u>1 / year</u>	<u>yearly</u>	
Sludge:	<u>none</u>	<u>none</u>	<u>none</u>	

4. Have there been any inhibitions or upsets at the POTW (since the last PCI of Audit) which were believed to be caused by industrial discharges? If so, describe the action taken by the City to ensure that the incident would not recur. Were these actions effective?
none

C. INDUSTRIAL USER CONTROL MECHANISM

1. Is the POTW using the type of control mechanism (permit, agreement, etc.) required by the approved program? yes, permit

2. How many IU permits (or other control documents) have been issued? 1

3. DO ALL SIGNIFICANT IUS HAVE CURRENT (UNEXPIRED) CONTROL DOCUMENTS? IF NOT, LIST ALL UNPERMITTED SIUS, THE DATE OF EXPIRATION OF THEIR PREVIOUS PERMIT (IF APPLICABLE), AND THE REASON FOR DELAY IN ISSUING THE REQUIRED DOCUMENT.
yes

4. Does the control document contain the following items?
An expiration date: yes

Discharge limitations: yes

If the program requires self-monitoring by the IUs, do the Permits contain:

IU self-monitoring requirements: yes - Changed from 2/yr. to 1/year

IU reporting requirements: yes

5. Indicate which of the following recommended standard conditions are contained in the control documents:

- Sample location: yes
- Type of sample: yes
- Monitoring frequency: yes
- Bypass prohibition: yes
- Right of entry: yes
- Nontransferability: yes
- Revocation clause: yes
- Penalty Provisions: yes
- Slug load notification: yes
- Notification of process change: yes

D. MONITORING OF IUS BY POTW

1. Indicate current inspection and sampling frequency and program requirement below:

	Current frequency:	Program Requirement:
Sampling:		
categorical IUs	<u>1 / year</u>	<u>2 / year</u>
other SIUs	<u>randomly</u>	<u>NA</u>
Inspection:		
categorical IUs	<u>1 / year</u>	<u>2 / year</u>
other SIUs	<u>randomly</u>	<u>NA</u>

2. HAS EACH SIU BEEN INSPECTED AND SAMPLED AT THE FREQUENCY REQUIRED BY THE APPROVED PROGRAM? no

3. Are inspections announced or unannounced? announced

4. Are records kept of each inspection? yes

5. Does the inspection report contain an adequate description of the following:

Date and time of inspection: yes

Officials present: yes

Inspection of chemical storage areas: yes

Description of regulated processes, categorical waste streams, and discharge location of these waste streams: yes

Inspection of the pretreatment facilities: no

Review of self-monitoring records: S-M records reviewed in PC office rather than during inspection

Observation of IU self-monitoring procedures: yes

Verification that approved analytical techniques are used: yes
verified at office

Verification of IU flow measurement (where required): yes

6. Overall adequacy of inspection documentation: More information needs to be included in the inspection documentation. The actual inspection of proper operation and maintenance of the treatment units should be included in the inspection report.
7. DOES THE POTW SAMPLE IUS FOR ALL POLLUTANTS REGULATED IN THEIR PERMITS? (IT IS NOT NECESSARY TO SAMPLE FOR ALL POLLUTANTS EVERY TIME, BUT IT MUST BE DONE PERIODICALLY). yes
8. Are analyses performed in accordance with EPA-approved methods (40 CFR 136)? yes
9. Are sampling and flow monitoring equipment properly maintained? yes
10. Is the POTW keeping proper field notes and chain of custody forms? yes
11. Is the sampling location representative of the discharge to the collection system? NE
12. Are sampling locations identified in POTW records? yes
13. Are sampling services available in an emergency? yes
14. What are the POTW's procedures for tracking receipt and review of IU reports, such as BMR's, semi-annual reports, progress reports, bypass reports, and self-monitoring reports? each IU has a separate three ring binder containing all facility information and is arranged by separate sections
15. ARE SELF-MONITORING REPORTS REVIEWED TO VERIFY THAT ANALYSES WERE PERFORMED FOR ALL REGULATED PARAMETERS, AND TO EVALUATE COMPLIANCE WITH EFFLUENT LIMITS? yes,
16. IF VIOLATIONS ARE FOUND IN REPORTS, DOES THE POTW RESPOND TO ALL VIOLATIONS? yes

17. What are the POTW's procedures for following up violations?
**Point out problems for minor paperwork errors. Issue NOV's
and fines for major permit violations.**

18. HAS THE POTW REVIEWED BMRS FOR COMPLIANCE WITH 40 CFR
403.12(b)?: **yes**

Review a Baseline Monitoring Report from the POTW's file,
and indicate which of the following items can be identified
in the BMR:

Name and address: **yes**

Other environmental permits held: **yes**

Description of operations: **yes**

Process flow diagrams: **yes**

Flow measurements: **yes**

Measurements of regulated pollutants: **yes**

Certification of compliance by the IU: **yes**

Compliance schedule (if needed): **NA**

19. Additional comments on the POTW's inspection and sampling
procedures:

**BMR's aren't updated. This information is gathered from a
facility when first comes onto program.**

E. Enforcement

1. HAS THE POTW IMPLEMENTED ENFORCEMENT RESPONSE PROCEDURES TO ADEQUATELY ADDRESS EVERY IU VIOLATION OF PRETREATMENT STANDARDS AND REQUIREMENTS? yes

2. How does the POTW respond to the following violations?

Effluent limitations: NOV and fines

Late reports: NOV and fines

Unpermitted discharges: NOV and fines

Slug loads or spills: NOV and fines

3. IS THE LIST OF SIGNIFICANT VIOLATORS PUBLISHED BY THE POTW DEVELOPED IN ACCORDANCE WITH EPA REGION VI CRITERIA FOR SIGNIFICANT VIOLATING INDUSTRIAL USER (DATED AUGUST 22, 1985)? NA

4. List the SIUs which have met the criteria for Significant Violator within the last 12 months, and describe the enforcement action which has been taken by the POTW. If construction is required, please indicate whether the IU has been placed on an enforceable compliance schedule.

Name:	Type of Violation:	Enforcement Action:	Compliance Deadline:
<u>NA</u>			

5. Comments on the POTW's enforcement procedures:
satisfactory

F. POTW'S PRETREATMENT ORGANIZATION STRUCTURE

1. Is the program structure essentially the same as that presented in the approved pretreatment program? The program has been updated and is awaiting ADEQ approval.

2. Are staffing levels adequate? yes

3. Are the responsible officials familiar with the approved program? yes

G. MULTIJURISDICTIONAL ISSUES

1. List any IUs which are located outside of the jurisdictional area of the POTW: none

2. Does the POTW have adequate procedures for controlling IUs located outside its jurisdictional area? NA

3. Does the POTW have copies of permits for IUs in other cities? NA

4. Have any of these IUs met the criteria for Significant Violator? If so, have they been published by the POTW in its annual list of Significant Violators? NA

5. Comments on multijurisdictional issues: NA

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

PPETS CODE SHEET

PRETREATMENT COMPLIANCE INSPECTION (PCI)

		CODE
INSPECTOR'S NAME:	<u>Shan Lynch</u>	
NAME OF FACILITY:	<u>City of Nashville</u>	
PERMIT NUMBER USED TO TRACK PROGRAM:	<u>AR0021776</u>	NPID
DATE OF PCI:	<u>December 4, 2013</u>	DTIA

PPETS WENDB DATA ELEMENTS

NUMBER OF SIGNIFICANT IUS (SIUS):	<u>1</u>	SIUS
NUMBER OF CATEGORICAL IUS:	<u>1</u>	CIUS
SIUS NOT SAMPLED OR INSPECTED BY POTW:	<u>0</u>	NOIN
SIUS WITHOUT CONTROL MECHANISM:	<u>0</u>	NOCM
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH STANDARDS OR REPORTING:	<u>0</u>	PSNC
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH SELF-MONITORING REQUIREMENTS:	<u>0</u>	MSNC
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH SELF-MONITORING AND NOT INSPECTED OR SAMPLED BY POTW:	<u>0</u>	SNIN

City of Nashville
426 North Main Street
Nashville, AR 71852
1-870-845-4015

January 3, 2014

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

Mr. Shan Lynch
District 7 Field Inspector
Water Division

Re: Reply to Inspection Letter dated December 30, 2013

Dear Mr. Lynch:

We appreciate all your comments and requirements noted during your last inspection. Inspections are eye-openers to tell us at the waste treatment plant and laboratory necessary changes needed to help us in our daily operations. This letter answers and corrects those necessary changes. It is our intention to tell you that we take your comments seriously and have taken actions to correct any problems found. We look forward to your next visit in the near future.

Attachment follows. If further changes or comments are needed, we will address them in a quick fashion. You may contact me at 870-845-4015.

Sincerely,



Larry Dunaway
Public Works Director

Cc: Greg Strawn, Water/Wastewater Superintendent
Ed Carlyle, Jr., Pretreatment/Laboratory

Wastewater Treatment Plant

1. For the purpose of calculating the mass loadings, the average flow measurement during the 6-hr composite sample period should be used for the parameters requiring composite samples and the instantaneous flow measurement taken at the time the grab samples are collected should be used for the parameters requiring grab samples. Currently the facility is calculating all mass loadings using a 24 hour flow.

REPLY (1): We have changed our lab sheets to incorporate records for flow of 6-hr and 24 hour flow rates. The six hour composite flow rate is as follows: the beginning time (10:00 am), the ending time (16:00 pm), record the total, and who is responsible for recording the results. We also record from the wastewater laboratory sheets the 24-hour flow rate for DMR records.

2. A DMR calculation check revealed an error in calculating the loadings for Ammonia Nitrogen for July 2013. No reason for the calculation error could be found.

REPLY (2): Human Error, more time will be implemented and a triple check method to make sure all calculations are correct and the person recording such results knows correct procedures.

3. The exact location of sample collection is not noted on the facility records for the parameters sent to the contract lab for analyses.

REPLY (3): Ed Carlyle, Laboratory Technician, has contacted and talked with Ben Head, AnaLab Supervisor, the location of samples taken will be applied on the laboratory sheets or else written in under comments by sampling personnel.

4. The name of the individual collecting the sample is not noted on the facility records for the parameters sent to the contract lab for analyses.

REPLY (4): The person collecting the sample now is responsible for filling out the needed data and signature in his or her own writing as per new laboratory record keeping lab sheet. All personnel have been trained and now know their responsibility concerning record keeping. Two lab technicians have returned to city hall to their own jobs as their training is over with, this has eliminated any confusion with records and signatures.

5. Not all sample collection times and analyses times are accurate. Facility records should indicate the exact time each sample is collected and the exact time each sample is analyzed.

REPLY (5): See reply number 4.

6. The identification of the analyst recorded on the facility bench sheets is not always accurate. Facility records should indicate the exact individual performing the analyses.

REPLY (6): Personnel have been trained and know their responsibilities of record keeping and some personnel have been removed from the laboratory which will eliminate some of the confusion with all the record keeping.

7. An excessive amount of sludge was observed in the aeration lagoons. This sludge should be removed in order to maintain the designed volume and achieve maximum treatment. Please consult with the ADEQ Permits Branch staff as specific permitting requirements may be needed for the disposal of this sludge.

REPLY (7): New permit requirements for the new wastewater treatment plant and construction with the new sludge removal system will solve this problem. Nashville has never had the system to remove sludge. We now have incorporated sludge removal with this new system.

8. Excessive sewage-related solids were found in the aeration and facultative lagoons. A primary bar screen should be installed to collect the solids prior to entering the system.

REPLY (8): The new treatment system currently under construction has plans to install a bar screen within the influent collection system.

9. Interior levee bank erosion and excessively tall vegetation was noted in various locations.

REPLY (9): Steps have already been taken to improve levee bank erosion by the placement of rip-rap around the banks of the holding pond. Excessive tall vegetation will be scheduled for removal by the distribution personnel in the near future.

10. Duplicates of the in-house analyzed parameters are not being performed as required. No documentation that duplicates have been performed after April 2013 could be located.

REPLY (10): A new laboratory bench sheet has been developed to incorporate room for duplicates for all analyses performed by the lab. Dates are monthly recorded on a lab calendar for the year.

11. The NH₃-N monthly average concentration and monthly average lbs/day exceeded the permit limits.

REPLY (11): The construction to be completed by the end of 2014 of a new waste

treatment plant is planned around this problem and should eliminate any problems concerning ammonia.

Sanitary Sewer Overflow

No violations of the permit were found during the inspection.

Pretreatment

1. The current program requires that the City sample and inspect the Categorical Industrial Users twice per year. However, these sampling and inspection events are only performed once per year.

REPLY (1): On December 5, 2013 a letter was sent to Jan-Eze Plating which changed the sampling and inspection requirements from two per year to only once per year. This was an amendment to the current discharge permit. In accordance with 40 CFR 403.8 all significant or categorical industrial users must be inspected and sampled at least once per year. Recent inspections have noticed no discrepancies and repeated information year after year, thus the reduction of sampling and inspections.

WWTP Construction Permit

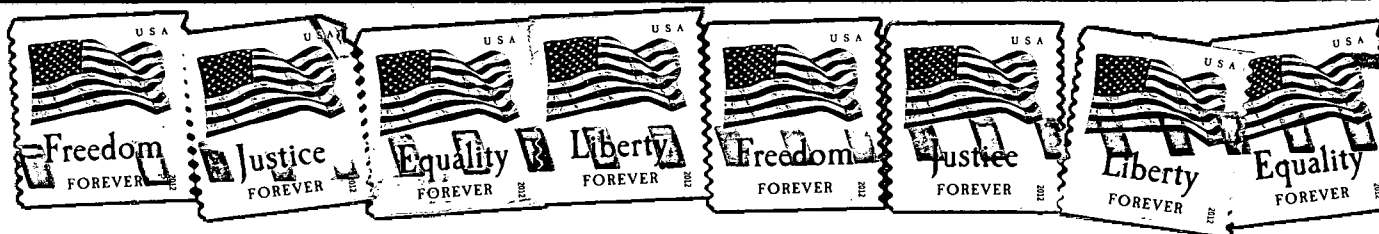
1. This permit states that "if the construction site will disturb in excess of one (1) acre, the permitted must comply with the terms of the Storm water Construction General Permit Number ARR15000 prior to the start of construction. Best Management Practices (BMP's) must be in place regardless of the size." No storm water controls were observed to be in place at the time of the inspection.

REPLY (1): A storm water permit has recently been obtain and is in full effect. Nashville Public Director, Larry Dunaway, has fulfilled this requirement. All questions of concern can be answered by contacting Larry at 870-845-4013.

Land Application Permit

No violations of this permit were found during the inspection.

CITY OF NASHVILLE
LARRY DUNAWAY
PUBLIC WORKS
DIRECTOR
426 NORTH MAIN STREET
NASHVILLE, AR 71852



FUN 4

State of Arkansas
ADEQ
Attention: Shan Lynch
District 7 Field Inspector
5301 Northshore Dr
North Little Rock, AR 72118-5317



ADEQ

ARKANSAS
Department of Environmental Quality

January 17, 2014

Larry Dunaway, Public Works Director
City of Nashville
426 North Main Street
Nashville, AR 71852

RE: Response to Inspections (Howard Co)

AFIN: 31-00036

NPDES Permit No.: AR0021776

AR0021776C

31-00274

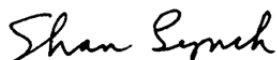
Permit No.: 4794-WG-WR

Dear Mr. Dunaway:

I have reviewed the response pertaining to my December 2, 2013 inspections of the City of Nashville's wastewater treatment facility and the related permits. 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 870 389-6970 or you may e-mail me at lynch@adeq.state.ar.us.

Sincerely,



Shan Lynch
District 7 Field Inspector
Water Division