

March 25, 2014

Mr. Larry Garrett, Director Huntsville Water Utilities City Of Huntsville P.O. Box 430 Huntsville, AR 72740

AFIN: Compliance Inspection

44-00018, NPDES Permit No: AR0022004,

Dear Mr. Garrett,

On March 7, 2014, Matt Holden, District 1 Field Inspector, and I performed a compliance inspection of the above referenced 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 inspection revealed the following:

- 1. Facility obtains grab samples for fecal coliform analysis once a week as required by the permit. On October 23 and 30, 2013, an operator did not record analyst, analysis date, and analysis time. This is in violation of Part III, Section C.8.c and d of the permit.
- 2. Facility and contract lab need to update the Standard Methods to indicate the current methods approved in the Federal Register dated May 18, 2012. For example, the facility's records indicate the Standard Method for pH is 4500 H+B, SM 18th Edition. Currently, the approved Standard Method in the Federal Register is 4500–H+ B–2000. This is in violation of Part III, Section C.8.e of the permit.
- 3. Vegetation needs to be removed from the anoxic basin. This is in violation of Part III, Section B.1.a of the permit.

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 April 8, 2014.

If I can be any assistance, please contact me at west@adeq.state.ar.us or 479-267-0811, ext. 12.

Sincerely,

Alison West

District 1 Field Inspector

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Water Division

♦EPA UNITED STATES ENVIRONM Washingto	Form Approved OMB No. 2040-0003 Approval Expires 7-31-85									
NPDES Compliand										
Section A: National Data System Coding										
Transaction Code NPDES										
1 N 2 5 3 A R 0 0 2 2 0	C 19 S 20 1									
Remarks										
Inspection Work Days Facility Evaluation F	· ·	BI N 72	QA	1	-Reserved					
67 69 70 3	71	N 72	N /3 /4	75	80					
N. IV. C.		B: Facilit			D CERCO CE D					
Name and Location of Facility Inspected (For industrial users disc include POTW name and NPDES permit number)	charging to POIV	N, also	Entry Time/Date 9:30 a.m./3-7-2014		Permit Effective Date 6/1/2011					
City of Huntsville 30187 Madison Hwy 23 Huntsville, AR			Exit Time/Date 12:25 p.m./3-7-2014		Permit Expiration Date 5/31/2014					
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Num Larry Garrett/Huntsville Water Utilities Director	mber(s)			Ot	her Facility Data					
Bill Eoff/Wastewater Plant Manager/479-738-2081/479-738-12	85									
Name, Address of Responsible Official/Title/Phone and Fax Num Mr. Larry Garrett, Water Utilities Director	ber			PI	OS # 076812					
City of Huntsville			Contacted							
P.O. Box 430 Huntsville, AR 72740			Yes No No							
479-738-6929 Sec	ction C: Areas E	valuated l	Uuring Inspection							
(S = Satisfactor		U = Unsa	tisfactory, N = Not Evaluated)		<u> </u>					
S Flow Measureme		H	perations & Maintenance	S	Sampling					
M Records/Reports S Self-Monitoring		N	udge Handling/Disposal	N N	Pollution Prevention					
c compliance sent	edules	<u> </u>	etreatment orm Water	N						
Emdend Receiving Waters Emboratory	of Findings/Com		orm water ttach additional sheets if nec		Other:					
The following violations were noted:										
 Facility obtains grab samples for fecal coliform and analyst, analysis date, and analysis time. 	alysis once a wee	k as requ	red by the permit. On Octob	er 23 and	30, 2013, an operator did not record					
2. Facility and contract lab need to update the Standard Methods to indicate the current methods approved in the Federal Register dated May 18, 2012. For example, the facility's records indicate the Standard Method for pH is 4500 H+B, SM 18 th Edition. Currently, the approved Standard Method in										
the Federal Register is 4500–H+ B–2000. 3. Vegetation needs to be removed from the anoxic basin.										
Name(s) and Signature(s) of Inspector(s) Agency/Office/Telephone/Fax Date										
Alison West	AR Dept. of Environmental Quality- Fayetteville (479)267-0811, Ext. 12/(479) 267-0819 (Fax)			March 21, 2014						
AAADVA 11 LOW V	(117)207 0011	, ==== •	., (2 ****)							
Signature of Reviewer			d Fax Numbers		Date					
Jason Bolenbaugh ADEQ/Water Division/501-682-0659 March 24, 2014										

SECTION A: PERMIT VERIFICATION	
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS	☑S ☐M ☐U ☐NA ☐NE
DETAILS:	<u> </u>
1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE:	ØY □N □NA □NE
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES:	□Y □N ØNA □NE
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT:	Øy □n □na □ne
4. ALL DISCHARGES ARE PERMITTED:	ØY □N □NA □NE
SECTION B: RECORDKEEPING AND REPORTING EVALUATION	
RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT	□S ☑M □U □NA □NE
DETAILS: Facility obtains grab samples for fecal coliform analysis once a week as require October 23 and 30, 2013, operator did not record analysis, analysis date, and analysis tim	
need to update the Standard Methods to indicate the current methods approved in the Fed	
2012.	<u>,</u>
ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS:	☑Y □N □NA □NE
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE:	□S ØM □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 ØN □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 ØM □U □NA □NE
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED: Generator/Tested Weekly	⊠s □m □u □na □ne
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE:	⊠s □m □u □na □ne
5. ALL NEEDED TREATMENT UNITS IN SERVICE:	⊠S □M □U □NA □NE
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED	⊠s □m □u □na □ne
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED:	□S □M □U □NA ☑NE
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE:	☑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:	Øy □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:	□Y ☑N □NA □NE
15. IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT:	□Y □N ☑NA □NE

CI	ECTION D: SAMPLING			
			U DNA D	7
	ERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS		LU LINA L	
-	ETAILS:			
1.	SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT:		☑Y □N □NA	
2.	LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES:		ØY □N □NA	
3.	FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT:		ØY □N □NA	
4.	SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT:		☑Y □N □NA	
5.	SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT:		ØY □N □NA	
6.	SAMPLE COLLECTION PROCEDURES ADEQUATE:		☑Y □N □NA	
	. SAMPLES REFRIGERATED DURING COMPOSITING:		☑Y □N □NA	
	. PROPER PRESERVATION TECHNIQUES USED:		☑Y □N □NA	
С	. CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136:		OY ON ONA	
7.	IF MONITORING IS PERFORMED MORE OFTEN THAN REQUIRED ARE RESULTS REPORTED ON THE DMR:		□Y □N ☑NA	□NE
	ECTION E: FLOW MEASUREMENT			
	ERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS		U DNA D	_NE
DE	TAILS: <u>Discussed improvements to flow calibration check procedures.</u>			
1.	PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: TYPE OF DEVICE: 2 foot H FI	<u>ume</u>	☑Y □N □NA	
2.	FLOW MEASURED AT EACH OUTFALL AS REQUIRED:		☑Y □N □NA	
3.	SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED:		☑Y □N □NA	
4.	CALIBRATION FREQUENCY ADEQUATE: Last calibrated on December 11, 2013.		☑Y □N □NA	□NE
5.	RECORDS MAINTAINED OF CALIBRATION PROCEDURES:		☑Y □N □NA	□NE
6.	CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE:		☑Y □N □NA	□NE
7.	FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE:		☑Y □N □NA	□NE
8.	FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES:		☑Y □N □NA	□NE
9.	HEAD MEASURED AT PROPER LOCATION:		☑Y □N □NA	□NE
SI	ECTION F: LABORATORY			
PE	ERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS	☑s □m	U DNA D	
DE	ETAILS:			
1.	EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(B) FOR SLUDGES) :		☑Y □N □NA	□NE
2.	IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED:		□Y □N ☑NA	□NE
3.	SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT:		☑Y □N □NA	□NE
4.	QUALITY CONTROL PROCEDURES ADEQUATE:		☑Y □N □NA	□NE
5.	DUPLICATE SAMPLES ARE ANALYZED ≥10% OF THE TIME:		☑Y □N □NA	□NE
6.	SPIKED SAMPLES ARE ANALYZED ≥10% OF THE TIME:		☑Y □N □NA	□NE
7.	COMMERCIAL LABORATORY USED:		☑Y □N □NA	□NE
а	. LAB NAME: Environmental Services Company, Inc.	American Interplex	Corporation	
b	. LAB ADDRESS: 1107 Century Avenue, Springdale, AR 72762	8600 Kanis Road,	Little Rock, AR 7220	04
С	. PARAMETERS PERFORMED: Ammonia Nitrogen, Total Phosphorous, Nitrate + Nitrite, CBOD, TSS, TDS	Chronic Biomonit	oring_	
8.	BIOMONITORING PROCEDURES ADEQUATE:		☑Y □N □NA	□NE
а	. PROPER ORGANISMS USED:		☑Y □N □NA	□NE
b	. PROPER DILUTION SERIES FOLLOWED:		☑Y □N □NA	□NE
С	. PROPER TEST METHODS AND DURATION:		☑Y □N □NA	□NE
d	. RETESTS AND/OR TRE PERFORMED AS REQUIRED:		☑Y □N □NA	□NE

SECTION	G: EFFLUE	NT/RECEIVIN	IG WATERS	OBSERVATION	ONS			
	N VISUAL OBS					⊠s □m □	U DNA DNE	
	Snow run-off.							
OUTFALL #:	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	COLOR	OTHER	
001	None	None	None	Trace	None	Clear		
	<u> </u>	<u> </u>	<u> </u>		1	1		
SECTION	H: SLUDGE	DISPOSAL						
SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS ØS DM DU DNA								
			-		er Permit Tracking			
-	IANAGEMENT ADEQU						□U □NA □NE	
2. SLUDGE R	ECORDS MAINTAINED	O AS REQUIRED BY 40) CFR 503:			□ѕ□м	□U □NA ☑NE	
3. FOR LAND	APPLIED SLUDGE, TY	PE OF LAND APPLIE	O TO: (E.G., FOREST,	AGRICULTURAL, PU	BLIC CONTACT SITE): A	gricultural		
SECTION	I: SAMPLIN	G INSPECTION	N PROCEDI	JRES				
	RESULTS WITH					□s □м □	U □NA ☑NE	
DETAILS:								
1. SAMPLES	OBTAINED THIS INSPI	ECTION:				□ч	□N □NA ☑NE	
2. TYPE OF S	SAMPLE: GRAB:_	□COMPOSITE: N	METHOD: FREQUE	NCY:				
3. SAMPLES I	PRESERVED:					□ч	□N □NA ☑NE	
4. FLOW PRO	PORTIONED SAMPLE	S OBTAINED:				□ч	□N □NA ☑NE	
5. SAMPLE O	BTAINED FROM FACIL	LITY'S SAMPLING DE\	/ICE:			□Y	□N □NA ☑NE	
6. SAMPLE R	EPRESENTATIVE OF	VOLUME AND NATUR	E OF DISCHARGE:			□Y	□N □NA ☑NE	
7. SAMPLE SI	PLIT WITH PERMITTEI	E:				□Y	□N □NA ☑NE	
8. CHAIN-OF-	CUSTODY PROCEDU	RES EMPLOYED:				□Y	□N □NA ☑NE	
9. SAMPLES	COLLECTED IN ACCO	RDANCE WITH PERM	IT:			□Y	□N □NA ☑NE	
SECTION	J: STORM V	VATER POLL	UTION PRE	VENTION PL	AN			
STORM W	ATER MANAG	EMENT MEET	S PERMIT RE	QUIREMENTS	3	□s □м □	U □NA ☑NE	
DETAILS:	The facility has	a no exposure	certification.		<u>.</u>			
	PDATED AS NEEDED:_					□Y	□N □NA ☑NE	
2. SITE MAP I	INCLUDING ALL DISCH	HARGES AND SURFA	CE WATERS:			□Y	□N □NA ☑NE	
3. POLLUTION	3. POLLUTION PREVENTION TEAM IDENTIFIED:							
4. POLLUTION	4. POLLUTION PREVENTION TEAM PROPERLY TRAINED:							
5. LIST OF POTENTIAL POLLUTANT SOURCES:								
6. LIST OF PO	6. LIST OF POTENTIAL SOURCES AND PAST SPILLS AND LEAKS:							
7. ALL NON-STORM WATER DISCHARGES ARE AUTHORIZED:							□N □NA ☑NE	
8. LIST OF ST	RUCTURAL BMPS:					□Y	□N □NA ☑NE	
9. LIST OF NO	ON-STRUCTURAL BMF	PS:				□Y	□N □NA ☑NE	
10. BMPS PRO	PERLY OPERATED A	ND MAINTAINED:				□Y	□N □NA ☑NE	
11. INSPECTIO	ONS CONDUCTED AS	REQUIRED:				□Y	□N □NA ☑NE	

FLOW CALCULATION SHEET

Date: 3-7-	2014 Ti	me: 11:55							
Head in Inc	hes:	Feet: 1.0							
Type & Size of Primary Flow Measurement Device: 2 foot H Flume									
	odel of Secondary F urotherm Model 39		ent Device:						
Recorded F	Flow at Date & Time	e Listed Above:	1.353	_ (Facility Flow Meter)					
	Flow at Date & Timed using flow charts in: IS		1.454 ow Measurement Handbook-5 th	Edition)					
% Error =	% Error = Recorded Value - Calculated Value X 100 Calculated Value								
% Error = 1.353 - 1.454 X 100									
% Error =	-0.069	X 100							
% Error =	-6.9	_ %							

Comments:

DMR Calculation Check

Reporting Period: From 14 11 01 To 14 11 30 Year Month Day Year Month Day

Parameter Checked: Ammonia
Nitrogen

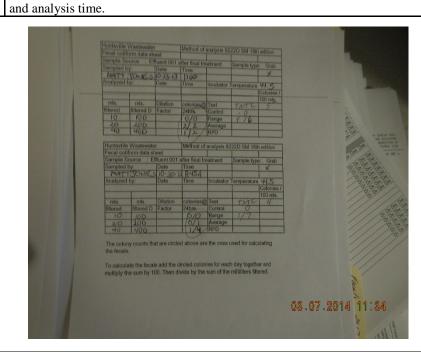
Loading Concentration Monthly Mass Mo. Avg. - lbs/day Mo. Avg. - mg/l 7-day Avg. - mg/l **Reported Value:** 6.2 **0.8** 2.0 **Calculated Value: 6.2** 0.8 2.0 **Permit Value: 50** 3 4.5

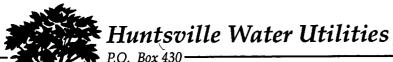
If calculated value does not equal reported value, explain:

Location:	Cit	City of Huntsville POTW							
Photographer: Alison West		Witness:	Matt Holden						
Photo #	1	Of	2		Date:	3-7-2014	Time:	10:27 a.m.	
Description: DSCN2074. Vegetation in the anoxic basin.									



Photograph	er:	Alison	West		Witness:	Matt Holden		
Photo #	2	Of	2		Date:	3-7-2014	Time:	11:34 a.m.
Description: DSCN2089. On October 23 and 30, 2013, an operator did not record analysis, analysis date,							nalysis date,	





04/03/2014

Arkansas Department of Environmental Quality

5301 Northshore Drive

North Little Rock, AR 72118-5317

RE: Compliance Inspection Response for City of Huntsville permit# AR0022004

Please accept this as our response to compliance inspection that took place at the Huntsville Wastewater Facility on March 7, 2014 with Matt Holden and Alison West.

1. Facility obtains grab samples for fecal coliform analysis once a week as required by permit. On October 23 and 30, 2013 an operator did not record analyst, analysis date, and analysis time on the fecal bench sheet.

Response: We are sorry this happened. It was an over site by our lab technician. He failed to complete the bench sheet form with the proper data on the final day of analysis. We have spoken with the technician about the importance of completing the bench sheet while doing the analysis in the future.

2. Facility and contract laboratory need to update the Standard Methods to indicate the current methods approved in the Federal Register dated May 18, 2012.

Response: We were unaware of the changes to the methods for analysis. We would like to thank Alison for bringing this to our attention. She was able send us a link, so we could determine the proper Methods for Analysis in the future. We have since changed our documentation to reflect these changes and also contacted our contract laboratory to do the same.

3. Vegetation needs to be removed from anoxic basin.

Response: We removed the vegetation on 3/27/14 and will keep vegetation out of the

Please feel free to contact us at any time with questions or concerns.

Sarry D. Darrett

Director

Huntsville Water Utilities

479-738-6929

water@madisoncounty.net---



Arkansas Department of Encuronmental quality attent: Water Dimision Enforcement 5301 Northshare Drive North Little Rock, Av 72118-5317

7211845317

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July 14, 2014

Mr. Larry Garrett, Director Huntsville Water Utilities City Of Huntsville P.O. Box 430 Huntsville, AR 72740

RE: Compliance Inspection

AFIN: 44-00018, Permit No.: AR0022004

Dear Mr. Garrett:

I have reviewed the response pertaining to my March 7, 2014 inspection of the Huntsville Wastewater Treatment Facility. The information provided sufficiently addresses the violations referenced in my inspection report. At this time the Department has no further comment concerning this particular inspection. Acceptance of this response by the Department does not preclude any future enforcement action deemed necessary at this site or any other site.

If we need further information concerning this matter, we will contact you. Thank you for your attention to this matter. Should you have any questions, feel free to contact me at 479.267.0811, ext. 12 or you may e-mail me at west@adeq.state.ar.us.

Sincerely.

Alison West

District 1 Inspector

Water Division

www.adeq.state.ar.us