

October 29, 2014

Mike Spencer, Operator City of Mena 323 Polk 53 Mena. AR 71953

RE: Mena WWTP Inspection (Polk Co)

AFIN: 57-00423 NPDES Permit No.: AR0036692

ARR000145

Dear Mr. Spencer:

On September 29, 2014, I performed a Compliance Evaluation Inspection and an Industrial Stormwater Inspection of the above referenced facility and a Sanitary Sewer Overflow Inspection of the 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. A copy of the inspection report is enclosed for your records.

Please refer to the "Summary of Findings" section of each of the attached inspection reports and provide a written response for each violation that was noted. This response should be mailed to the attention of the Water Division Inspection Branch at the address at the bottom of this 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 November 12, 2014.

If I can be of any assistance, please contact me at mccabe@adeq.state.ar.us or (501) 682-0642.

Sincerely,

Kerri McCabe Inspector Supervisor Water Division

Kerri M'Caly

cc: Mike Spencer, Operator, City of Mena, menawwtp@gmail.com

	ADEO		WATER	DIVISION I	NSI	PFC.	TION	N REPORT
ADEO				ERMIT #: AR003 6				DATE: 9/29/2014
=			DUNTY: 57 Polk			#: 080		MEDIA: WN
A Der	R K A N S A S partment of Environmental Quality	GF	PS LAT: 34.55624	0 I ONG: -94 188	2061	OCAT	ION: F	ntrance
Dok	FACILITY INFORMAT							MATION
NAME		IOI		FACILITY TYPE:	-	CTOR ID#:	INI OINI	MATION
	na WWTP			1 - Municipal	840	22 S - S	State	
	TION:			FACILITY EVALUATION RATIN			INSPECTION	
SZ.	3 Polk 53			3 - Satisfactory				pliance Evaluation
-	na, AR			(-)	NTRY TIME:		TIME:	PERMIT EFFECTIVE DATE:
	RESPONSIBLE OFFIC	~I A I		9/29/2014 0	2:00	04:	:30	3/1/2012
NAME	KESPONSIBLE OFFICE: / TITLE	SIAL	-					PERMIT EXPIRATION DATE: 2/28/2017
Mil	ke Spencer / Operator							2/20/2017
COMF	PANY:			FAYETTEVILLE SHALE RELATED: N				
	y of Mena			FAYETTEVILLE SHALE VIOLATIONS: N				
	NG ADDRESS: 3 Polk 53			INSPECTION PARTICIPANTS				
	STATE, ZIP:			NAME/TITLE/PHONE/FAX/EMAIL/ETC.:				
Me	na AR 71953			Mike Spencer/Class III and Advanced Industrial WW				
	IE & EXT: / FAX:			Operator/(479)	234-2	592/me	enawwi	tp@gmail.com
	92342592 /							
EMAIL	ः •nawwtp@gmail.com							
	NTACTED DURING INSPECTION:	· Va	•					
	DIVIACTED DOKING INSPECTION.	. 16		LUATIONS				
	(S=S:	atisfac	AREA EVA ctory, M=Marginal, U=Unsati		/Evaluate	d)		
S	PERMIT	S FLOW MEASUREMENT N STORMWATER				TER		
S	RECORDS/REPORTS	S	S LABORATORY			FAC	ILITY S	SITE REVIEW
S	OPERATION & MAINTENANCE	S				SELI	F-MON	ITORING PROGRAM
S	SAMPLING	N SLUDGE HANDLING/DISPOSAL N PRETREATMENT						
**	** OTHER:							
	SUMMARY OF FINDINGS							
No	No violations were noted during the inspection. However, refer to "General Comments" for items that should							
be	be reviewed prior to the next inspection.							

GENERAL COMMENTS

On Sept 29, 2014, a CEI was conducted. A tour of the facility was conducted starting at the headworks and ending at the permitted outfall. The plant was clean and well-maintained. Considerable algae were noted in both aerated lagoons; however, there are corrective measures in place to address TSS issues related to algae. Mr. Spencer noted that the curtain in the primary lagoon was deteriorating due to exposure to sunlight. His main concern was the sludge depth in the primary lagoon (see attached sludge depth measurement). However, sludge accumulation does not appear to be affecting the permitted effluent limits or design volume at this time.

The laboratory was inspected, and no deficiencies were noted. Instruments had recently been calibrated and preservatives and buffers were up to date.

A flow check was conducted with results within the +/- 10% range. The Operator does not perform daily flow checks, and the secondary flow measuring device is calibrated annually. DMR calculations were checked against supplied in-house lab and contracted lab bench sheets. There were minor rounding errors noted.

Paperwork should be organized better. Some COCs weren't available from the contract lab. The March 26-27, 2014 bench sheet from the contract lab for CBOD5 and Ammonia-Nitrogen was missing, but values were reported in the spreadsheet maintained by the Operator and on the monthly DMR.

A review of the March and August 2014 COCs and bench sheets could not determine when Total Recoverable Copper was sampled. It was reported on both DMRs, but there was no indication from COCs or bench sheets that it had been collected.

The City of Mena has adopted a Pretreatment Program, and they currently only have two Industrial Users (IUs) with the potential to directly discharge to the WWTP. City issues permit to IU, IU notifies WWTP of batch, samples taken by City and IU, and follow established ordinance.

NOTE: AFIN is listed as 57-00042 on permit; AFIN is 57-00423.

INSPECTOR'S SIGNATURE:

SUPERVISOR'S SIGNATURE:

Machine

Jason Bolenbaugh

DATE: 10/29/2014

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
SECTION B: RECORDKEEPING AND REPORTING EVALUATION	
RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT	ØS □M □U □NA □NE
DETAILS: Better organization of paperwork.	•
ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS:	□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:	Øy □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:	Øs □m □u □na □ne
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE:	Øs □m □u □na □ne
5. ALL NEEDED TREATMENT UNITS IN SERVICE:	Øs □m □u □na □ne
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED: one (1) Class III and one (1) Class I	⊠s □m □u □na □ne
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED:	☑S ☐M ☐U ☐NA ☐NE
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE:	Øy □n □na □ne
9. STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED:	☑Y □N □NA □NE
10. PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED:	Øy □n □na □ne
11. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR:	□y Øn □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 Øn □na □ne
15. IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT:	□Y □N ☑NA □NE

SE	CTION D: SAMPLING	
PE	RMITTEE SAMPLING MEETS PERMIT REQUIREMENTS	☑S □M □U □NA □NE
DE	TAILS:	
1.	SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT:	Øy □n □na □ne
2.	LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES:	☑Y □N □NA □NE
3.	FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT:	☑Y □N □NA □NE
4.	SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT: Could not find where Total Recovera Copper was sampled; reported on DMRs.	ble ☑Y □N □NA □NE
5.	SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT:	☑Y □N □NA □NE
6.	SAMPLE COLLECTION PROCEDURES ADEQUATE:	☑Y □N □NA □NE
а	. SAMPLES REFRIGERATED DURING COMPOSITING:	☑Y □N □NA □NE
b	. PROPER PRESERVATION TECHNIQUES USED:	Øy □n □na □ne
С	. CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136: March 5-6, 2014 holding time exceeded for CBO	D5.
7.	IF MONITORING IS PERFORMED MORE OFTEN THAN REQUIRED ARE RESULTS REPORTED ON THE DMR:	□Y □N ☑NA □NE
SE	CTION E: FLOW MEASUREMENT	
PE	RMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS	☑S □M □U □NA □NE
DE	ETAILS:	
1.	PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: TYPE OF DEVICE: 90deg V-notch	weir ☑Y ☐N ☐NA ☐NE
2.	FLOW MEASURED AT EACH OUTFALL AS REQUIRED: Flow measured prior to post-aeration	ØY □N □NA □NE
3.	SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED: <u>HydroRange</u> Milltronics - totalizer	☑Y □N □NA □NE
4.	CALIBRATION FREQUENCY ADEQUATE: annually by contractor	☑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:	ØY □N □NA □NE
SE	CTION F: LABORATORY	
PE	ERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS	☑S □M □U □NA □NE
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: <u>Data Testing, Inc. (479-649-8378)</u>	
b	. LAB ADDRESS: 3434 Country Club, Fort Smith, AR 72903	
С	. PARAMETERS PERFORMED: CBOD5, Ammonia-Nitrogen, Total Phosphorus, and Nitrate-Nitrite	
8.	BIOMONITORING PROCEDURES ADEQUATE: Huther & Associates, Inc., 1156 N Bonnie Brae, Denton, TX 76201 (940-387-	1025) □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
1		

BASED ON VISUAL OBSERVATIONS ONLY DETAILS: OUTFALL #; OIL SHEEN GREASE TURBIDITY VISIBLE FOAM FLOATING SOLIDS OOT HER OOT NO NO NO Some, collected at bailte NO CLEAR n/a SECTION H: SLUDGE DISPOSAL SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS DETAILS: Permitted under State No-Discharge \$207-W (AFIN 57-00290). 1. SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS DETAILS: Permitted under State No-Discharge \$207-W (AFIN 57-00290). 2. SULDGE MANAGEMENT ADEQUATE TO MANITAIN EPTLUENT QUALITY: SECTION I: SAMPLING INSPECTION PROCEDURES SAMPLE RESULTS WITHIN PERMIT REQUIREMENTS DIS DIM DU ZINA DNE DETAILS: 1. SAMPLES OSTAINED THIS INSPECTION PROCEDURES SAMPLE RESULTS WITHIN PERMIT REQUIREMENTS DETAILS: 1. SAMPLES OSTAINED THIS INSPECTION 2. TYPE OF SAMPLE: GEAB. GLOOMPOSITE: METHOD. FREQUENCY: 3. SAMPLES PRESENVED: 4. FLOW PROPORTIONED SAMPLES OSTAINED: 5. SAMPLE SPENSENVED: 6. SAMPLE REPRESENTATIVE OF VOLUME AND NATURE OF DISCHARGE: 7. SAMPLES PRESENVED: 9. DIM DU ZINA DNE 8. SAMPLE SPENSENVED: 9. DIM DU ZINA DNE 5. SAMPLE SPENSENTATIVE OF VOLUME AND NATURE OF DISCHARGE: 9. DIM DU ZINA DNE 5. SAMPLES OSTAINED THIS SMEMILED SEMPLOVED: 9. DIM DU ZINA DNE 5. SAMPLES OSTAINED THIS SMEMILED SEMPLOVED: 9. DIM DU ZINA DNE 5. SAMPLES OSTAINED THIS SMEMILED SEMPLOVED: 9. DIM DU ZINA DNE 5. SAMPLES OSTAINED THIS SMEMILED SEMPLOVED: 9. DIM DU ZINA DNE 5. SAMPLES OSTAINED THIS SMEMILED SEMPLOVED: 9. DIM DU ZINA DNE 5. SAMPLES OSTAINED THIS SMEMILED SEMPLOVED: 9. DIM DU ZINA DNE 5. SMEMILES OSTAINED THIS SMEMILED SEMPLOVED: 9. DIM DU ZINA DNE 5. SMEMILES OSTAINED THIS SMEMILED SEMPLOVED: 9. DIM DU ZINA DNE 5. SMEMILES OSTAINED THIS SMEMILED SEMPLOVED: 9. DIM DU ZINA DNE 5. SMEMILES OSTAINED THIS SMEMILED SEMPLOVED: 9. DIM DU ZINA DNE 5. SMEMILES OSTAINED THIS SMEMILED SEMPLOVED: 9. DIM DU ZINA DNE 5. SMEMILES OSTAINED THIS SMEMILED SEMPLOVED: 9. DIM DIM DNE 5. SMEMILES OSTAINED THIS SMEMILED SEMPLOVED: 9. DIM DIM DNE 5. SMEMILES OSTAINED THIS SMEMILED SEMPLOVED: 9. DIM DIM DNE 5. SMEMIL	CECTION C		<u>'</u>	·	<u> </u>	Permit #. ARUUS	0092		
DETAILS: OUTFALL II: OIL SHEEN GREASE TURBIDITY VISIBLE FOAM PLOATING SOLIDS COLOR OTHER 001 NO NO NO NO Some; collected at bailtie SECTION H: SLUDGE DISPOSAL SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS SIDM DU MA DISE ESCATION H: SLUDGE DISPOSAL SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS SIDM DU MA DISE DETAILS: Permitted under State No-Discharge \$207-W (AFIN 57-00290). 1. SLUDGE MANAGEMENT ADEQUATE TO MANITAN EFFLUENT QUALITY: SIDM DU DIA DISE 3. FOR LAND APPLIED SLUDGE, TYPE OF LAND APPLIED TO: (E.G., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE): SECTION I: SAMPLING INSPECTION PROCEDURES SAMPLE RESULTS WITHIN PERMIT REQUIREMENTS SIDM DU MA DISE DETAILS: 1. SAMPLES OBTAINED THIS INSPECTION PROCEDURES SAMPLE GREAME: GRABE, DOME STANEE: METHOD, FREQUENCY: 2. TYPE OF SAMPLE: GRABE, DOME SAMPLES OBTAINED: 3. SAMPLES PRESERVED: SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE: 4. FLOW PROPORTIONED SAMPLES OBTAINED: 5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE: 6. SAMPLE SORTAINED THIS INSPECTION PROCEDURES: 9. CHAIN OF CONTROL SAMPLES OBTAINED: 1. SAMPLE SORTAINED FROM FACILITY'S SAMPLING DEVICE: 9. CHAIN OF CONTROL SAMPLES OBTAINED: 1. SAMPLES OBTAINED FROM FACILITY'S SAMPLING DEVICE: 9. CHAIN OF CONTROL SAMPLES OBTAINED: 1. SAMPLE SORTAINED FROM FACILITY'S SAMPLING DEVICE: 9. CHAIN OF CONTROL SAMPLES OBTAINED: 1. SAMPLE SORTAINED FROM FACILITY'S SAMPLING DEVICE: 9. CHAIN OF CONTROL SAMPLES OBTAINED: 1. SAMPLES OCCLECTED IN ACCORDANCE WITH FEMALT: 9. CHAIN OF CONTROL SAMPLES OBTAINED: 1. SAMPLES OCCLECTED IN ACCORDANCE WITH FEMALT: 1. SAMPLES OF THE SAMPLES					ATIONS			II DNA DNE	
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FLOW CALCULATION SHEET												
Date:	Sept 29	, 2014	Time	e: 14	54							
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Head in	Inches:			Feet:	0.700)						
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Date of	last Calil	oration of	Secon	dary F	low De	vice:	Apr	il 23	, 2014			
Record	ed Flow a	at Date &	Time L	isted A	Above:	473	3.2 gp	m		(Facil	ity Flow Met	er)
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% Error	· =	2.87	9	/ ₀								
Comments: Acceptable; within range.												

DMR Calculation Check

Reporting Period:	From	2014	03	01	_ To	2014	03	31
		Year	Month	Day		Year	Month	Day
Parameter Checked:		CBOD5	_					

	Loading	Concentration Monthly					
	Mass						
	Mo. Avg Ibs/day	Mo. Avg mg/l	7-day Avg mg/l				
Reported Value:	88	4	6				
Calculated Value:	88.1	4.2	6				
Permit Value:	259	10	15				

If calculated value does not equal reported value, explain:

Minor rounding errors.

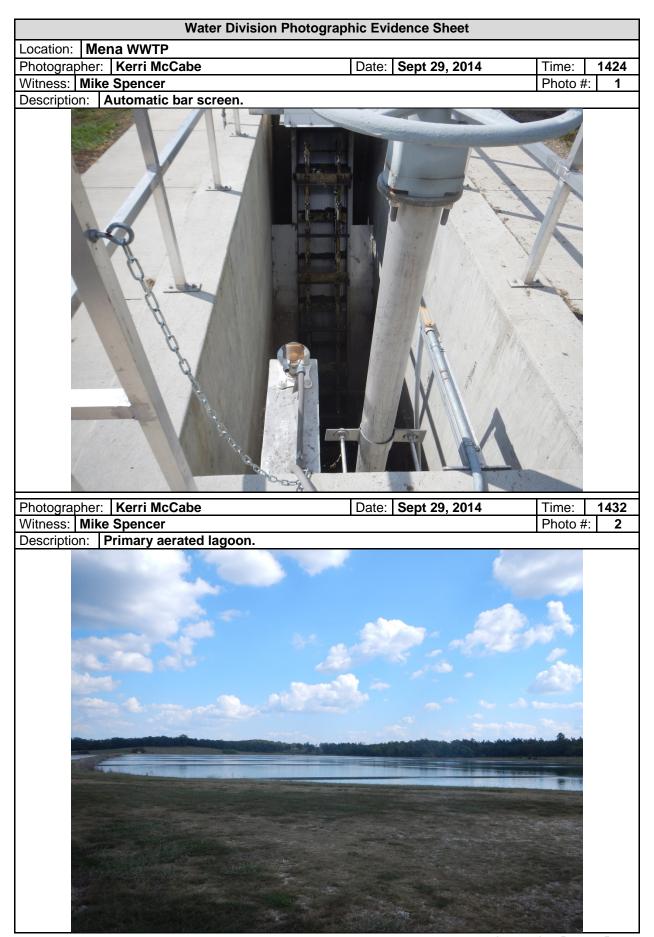
DMR Calculation Check

Reporting Period:	From	2014	80	01	_ To	2014	80	31
		Year	Month	Day		Year	Month	Day
Parameter Checked:		TSS	_					

	Loading Mass	Concentration Monthly					
	Mo. Avg Ibs/day	Mo. Avg mg/l	7-day Avg mg/l				
Reported Value:	181	9.3	11				
Calculated Value:	180	9.4	10.5				
Permit Value:	388	15	22.5				

If calculated value does not equal reported value, explain:

Minor rounding errors.





Water Division Photographic Evidence Sheet Location: Mena WWTP Photographer: Kerri McCabe Date: Sept 29, 2014 Time: 1449 Witness: Mike Spencer Photo #: 5

Description: Primary flow device; 90deg V-notch weir with totalizer behind head.



Photographer: Kerri McCabe Date: Sept 29, 2014 Time: 1449
Witness: Mike Spencer Photo #: 6

Description: Post-aeration.



Inspection Report: Mena WWTP, AFIN: 57-00423, Permit #: AR0036692

Water Division Photographic Evidence Sheet

Location: Mena WWTP

Photographer: Kerri McCabe Date: Sept 29, 2014 Time: 1451
Witness: Mike Spencer
Description: Outfall 001; baffle to retain foam.

Figure 1. Google Earth image dated Nov 11, 2012 of overview of the Mena WWTP.



LAGOON LAGOON		N & LAGOON
Sole	(L'(C) L	5'(6') 5'(6') 5'(6') 5'(6') 5'(6') 3' 2'3' 4'(6') 3'(6') 2'(6')
	5,9	5.5'(6) 4.5'(6) 5.5'(6) 5.5(6) 1.5' 7.3 4'(6') 3'(6')
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