

# ADEQ

ARKANSAS  
Department of Environmental Quality

August 21, 2015

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

**RE: City of Nashville WWTP Inspections (Howard Co)**  
**AFIN: 31-00036**                      **Permit No.: AR0021776**  
**ARR000453**  
**AR0021776C**

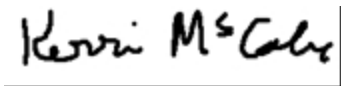
Dear Mr. Dunaway:

On July 27, 2015, I performed a Compliance Evaluation Inspection, an Industrial Stormwater Inspection, and a State WWTP Construction 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. Copies of the inspection reports are 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](mailto: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 31, 2015**.

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

Sincerely,



Kerri McCabe  
Inspector Supervisor  
Water Division

cc: Larry Dunaway, Public Works Director, City of Nashville, [larry19211@gmail.com](mailto:larry19211@gmail.com)



**AR K A N S A S**  
Department of Environmental Quality

## WATER DIVISION INSPECTION REPORT

AFIN: 31-00036	PERMIT #: AR0021776	DATE: 7/27/2015
COUNTY: 31 Howard	PDS #: 086031	MEDIA: WN
GPS LAT: 33.919938 LONG: -93.861286 LOCATION: Entrance		

FACILITY INFORMATION	INSPECTION INFORMATION
NAME: <b>City of Nashville WWTP</b> LOCATION: <b>743 Hwy 27 South</b> CITY: <b>Nashville, AR</b>	FACILITY TYPE: <b>1 - Municipal</b> INSPECTOR ID#: <b>84022 S - State</b> FACILITY EVALUATION RATING: <b>2 - Marginal</b> INSPECTION TYPE: <b>Compliance Evaluation</b>
	DATE(S): <b>7/27/2015</b> ENTRY TIME: <b>09:45</b> EXIT TIME: <b>15:30</b> PERMIT EFFECTIVE DATE: <b>7/1/2014</b> PERMIT EXPIRATION DATE: <b>6/30/2019</b>
RESPONSIBLE OFFICIAL	
NAME / TITLE: <b>Larry Dunaway / Public Works Director</b> COMPANY: <b>City of Nashville</b> MAILING ADDRESS: <b>426 North Main St</b> CITY, STATE, ZIP: <b>Nashville AR 71852</b> PHONE & EXT. / FAX: <b>870-845-4015 /</b> EMAIL: <b>larry19211@gmail.com</b>	FAYETTEVILLE SHALE RELATED: <b>N</b> FAYETTEVILLE SHALE VIOLATIONS: <b>N</b>
CONTACTED DURING INSPECTION: <b>Yes</b>	INSPECTION PARTICIPANTS
	NAME/TITLE/PHONE/FAX/EMAIL/ETC.: <b>Larry Dunaway/Public Works Director/(870) 845-4015</b> <b>Chip Colston/WW Chief Operator/(870) 845-4522</b> <b>"Mr. Ed" Carlyle, Jr./Pretreatment Coordinator/(870) 557-3143</b>

### AREA EVALUATIONS

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

<b>S</b>	PERMIT	<b>S</b>	FLOW MEASUREMENT	<b>M</b>	STORMWATER
<b>M</b>	RECORDS/REPORTS	<b>M</b>	LABORATORY	<b>S</b>	FACILITY SITE REVIEW
<b>M</b>	OPERATION & MAINTENANCE	<b>S</b>	EFFLUENT/RECEIVING WATER	<b>S</b>	SELF-MONITORING PROGRAM
<b>M</b>	SAMPLING	<b>S</b>	SLUDGE HANDLING/DISPOSAL	<b>N</b>	PRETREATMENT
<b>**</b>	OTHER:				

### SUMMARY OF FINDINGS

The following violations were noted during the inspection:

- 1.) There were no records that the permittee had sampled the influent for 30-day average present removal for Carbonaceous Biochemical Oxygen Demand (CBOD) and Total Suspended Solids (TSS) for 2014. This is a violation of Part II, Condition #2 of the permit. An influent sample must be collected and analyzed for the remainder of the permit cycle (starting in 2015).
- 2.) A dumpster has been placed at the enclosed bar screen to hold ejected solid waste until disposed. The dumpster is not enclosed or inside secondary containment, and solid waste (trash and floatables) was noted on the ground around the dumpster's concrete pad. This is a violation of Part II, Condition #6 of the permit. The dumpster should be enclosed or inside secondary containment to catch any residual solid waste and leakage. Any collected stormwater should be routed back to the headworks.
- 3.) For Nov 2014, the permittee was required to sample for Total Residual Chlorine (TRC) under Part I, Section A (design flow of 2.3 MGD). The permittee's laboratory bench sheet does not provide a "time analyzed" section for recording purposes for TRC. It is unclear if TRC was analyzed within fifteen (15) minutes of sampling as required by Part II, Condition #9 of the permit. As of June 2015, the permittee has been using the UV method of disinfection under the new plant design. TRC should be removed from the lab bench sheet.
- 4.) As of June 2015, the permittee has been discharging under the new plant design of 3.5 MGD. For June 2015, the contract lab utilized for Whole Effluent Toxicity (WET) testing used the dilutions/limits for the old plant design of 2.3 MGD (see Page 9 of Part II). This is a violation of Part II, Condition #10 of the permit. The June 2015 WET test failed, and the permittee was resampling during the inspection. The contract lab was

notified during the inspection of the new dilutions/limits. No further response is required for this item by the Inspection Branch; however, the permittee may wish to contact the Water Division's Planning Branch as this incident could affect future WET testing requirements.

5.) The following items are violations of Part III, Section B.1.A. of the permit:

- Excessive sludge is being stored in the two extended aeration activated sludge basins (formerly facultative aerated lagoons). This affects the design capacity as well as the treatment process. Some sludge has been diverted to the flow EQ basin (formerly two-cell polishing pond); however, the amount removed may not have been enough for proper treatment in the new plant.
- Existing sludge is old and is not allowing a proper sludge blanket to be formed in the two primary clarifiers.
- Excessive algae were noted growing on the Parshall flume walls and installed staff gauge. This makes it difficult to properly ready the primary flow device to compare with the secondary flow device for monthly flow accuracy checks.
- The secondary flow measuring device and electronics are exposed to the elements. A cover would protect the equipment and make it easier to read the totalizer's monitor.
- All systems of treatment are infested with suspended algae; however, DO, TSS, and pH effluent limits do not appear to be affected by the presence of algae.
- Excessive floatables and other solid waste were noted along the levees of the aeration basins and flow EQ pond. An enclosed bar screen has been installed and should reduce the amount of trash passing through to the aeration basins; however, these existing items along the levees should be removed and disposed of properly.
- The collection system experiences I&I during heavy rain events. This resulted in overflows of the flow EQ basin at both spillways from March – May 2015 and subsequent unpermitted discharges of partially treated wastewater into two streams. The City started a collection system rehabilitation project in 2014 and is outlined in the March 2015 reconnaissance inspection conducted by District 7 Inspector Red Smith. The City should continue to address problem areas within the collection system, and wastewater from the flow EQ basin should be routed into the treatment plant to increase storage capacity of the flow EQ basin.
- An SOP needs to be developed for the new treatment plant design.

6.) The following items are a violation of Part III, Section C.3. of the permit:

- DO and pH are not being read "immediately" per 40 CFR 136. For the April and Nov 2014 lab bench sheets, grab samples were collected at 0730; however, pH was not analyzed until 0800 in April 2014 and 0930 in Nov 2014. There is no "time analyzed" section to record time for DO on the lab bench sheet, and it is assumed DO is not being read immediately.
- The permittee's lab is using Standard Methods, 21<sup>st</sup> Edition (2005). There is a newer edition of Standard Methods, which is the 22<sup>nd</sup> Edition published in 2012.
- Equipment used to analyze the samples is not being calibrated and/or no calibration records were available during the inspection. This includes drying oven, incubator, fecal bath, and thermometers. It should be noted that the multi-probe DO/pH meter is being calibrated, and records are stored internally within the meter. Scales/balances are also being calibrated annually by a contracted source.
- The pH 10 buffer had expired June 2015.
- There is no thermometer in the automatic sampler for measuring temperature. The permittee is reading the sampler's digital thermometer, which reads an average temperature. A thermometer needs to be placed in the automatic sampler.

7.) There is no time for when pH, DO, and TRC are being analyzed on the lab's bench sheet. This is a violation of Part III, Section C.8.D. of the permit. The permittee needs to update the lab's bench sheet. Furthermore, pH is being recorded in two different places on the lab's bench sheet and this could be construed as additional monitoring as outlined in Part III, Section C.6. of the permit.

8.) Calibration records for the multi-probe DO/pH meter are stored internally within the meter. This type of recording does not contain all the items required per Part III, Section C.6.A – F. of the permit.

Although not listed as violations, a review of the permittee’s April 2014 lab bench sheet and DMR revealed that the results for TRC and DO were duplicated on April 22, 2014. The lower value for TRC was used and the higher value for DO was used. The higher value for TRC is to be used for effluent limit calculations. The lower value for DO is to be used for effluent limit calculations. Additionally, CBOD was duplicated on April 23, 2014 and the lower value was used. The higher value for CBOD is to be used for effluent limit calculations. For TSS, FCB, and pH, the correct values were used on the DMR. A review of the permittee’s Nov 2014 lab bench sheet and DMR revealed that the results for TRC were duplicated on Nov 4, 2014 and Nov 13, 2014. The lower value for the duplicates were used instead of the higher values. The higher value for TRC is to be used for effluent limit calculations. Also, for the Nov 2014 lab bench sheet and DMR, the DO was duplicated on Nov 13, 2014 and the higher value was recorded. The lower value for DO is to be used for effluent limit calculations. For CBOD, TSS, FCB, and pH, the correct values were used on the DMR. The permittee may need to contact the Enforcement Branch to submit corrected DMRs.

A minor discrepancy was noted while reviewing the permit: For Part I, Section A for the new plant design of 3.5 MGD (Page 3 of Part IA), the permit states, “Samples shall be taken after the dechlorination unit and prior to entering the receiving stream.” The new design utilizes UV disinfection, and the chlorine gas disinfection and dechlorination components of the old plant design have been removed. This appears to be a carryover from Part I, Section A for the old plant design of 2.3 MGD (Page 1 of Part IA). The permittee may wish to contact the Permits Branch for corrections; however, please be advised, it is the permittee’s responsibility to thoroughly review the Draft Permit prior to the issuance of the Final Permit.

**GENERAL COMMENTS**



On Mon July 27, 2015 an inspection of the City of Nashville’s WWTP was conducted with the above-mentioned participants. The inspection consisted of a facility tour, lab tour, and records review.

The permit is written to reflect the old plant design of 2.3 MGD and the new plant design of 3.5 MGD. The new plant consists of modifications of existing components and installation of additional components, and the new plant has been online treating wastewater since early June 2015. See “Summary of Findings” outlining major areas noted from the facility tour (e.g., sludge storage, excessive algae, solid waste along levees, exposed dumpster, etc.).

The lab was inspected next, and it was well-organized and clean. Only minor issues resulted from the lab tour, and these focused on calibration of equipment.

The records review only resulted in minor issues as well. Lab personnel should be reading DO, pH, and TRC immediately per 40 CFR 136. Based on times recorded on lab bench sheets, these parameters are not being read immediately.

The facility has experienced numerous NH3-N effluent limit violations (past and present), and hopefully the new plant will resolve these discrepancies and improve water quality.

INSPECTOR’S SIGNATURE: 	Kerri McCabe	DATE: 8/17/2015
SUPERVISOR’S SIGNATURE: 	Jason Bolenbaugh	DATE: 8/21/2015

<b>SECTION A: PERMIT VERIFICATION</b>	
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
DETAILS:	
1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES: <u>Language written in current permit for increase discharge.</u>	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT: <u>Need to update outfall coordinates.</u>	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
4. ALL DISCHARGES ARE PERMITTED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
<b>SECTION B: RECORDKEEPING AND REPORTING EVALUATION</b>	
RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT	<input type="checkbox"/> S <input checked="" type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
DETAILS:	
1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE:	<input type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
a. DATES AND TIME(S) OF SAMPLING:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
b. EXACT LOCATION(S) OF SAMPLING:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
c. NAME OF INDIVIDUAL PERFORMING SAMPLING:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
d. ANALYTICAL METHODS AND TECHNIQUES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
e. RESULTS OF CALIBRATIONS: <u>Use a multi-probe DO/pH meter that stores calibration results; not all info required stored.</u>	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
f. RESULTS OF ANALYSES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
g. DATES AND TIMES OF ANALYSES:	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
h. NAME OF PERSON(S) PERFORMING ANALYSES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE: <u>Could not locate 2014 records; only multi-probe being calibrated.</u>	<input type="checkbox"/> S <input checked="" type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
<b>SECTION C: OPERATIONS AND MAINTENANCE</b>	
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED	<input type="checkbox"/> S <input checked="" type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
DETAILS:	
1. TREATMENT UNITS PROPERLY OPERATED:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
2. TREATMENT UNITS PROPERLY MAINTAINED: <u>Buildup of excessive sludge in two aerated lagoons (converted into activated sludge basins).</u>	<input type="checkbox"/> S <input type="checkbox"/> M <input checked="" type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
5. ALL NEEDED TREATMENT UNITS IN SERVICE:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED: <u>One Class IV, four Class III, three Class II, and three Class I with five Advanced Industrial.</u>	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
9. STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
10. PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
11. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR: <u>Twice due to excessive rain; overflow of polishing pond at spillways (converted into flow EQ basin).</u>	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
12. IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
13. HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
14. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT:	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
15. IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE

<b>SECTION D: SAMPLING</b>	
<b>PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS</b>	<input type="checkbox"/> S <input checked="" type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
<b>DETAILS:</b>	
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: <u>ISCO sampler for composites.</u>	<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: <u>Using digital thermometer of sampler, which reads an average temperature.</u>	<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: <u>pH and DO are to be analyzed immediately (instantaneous).</u>	<input type="checkbox"/> Y <input checked="" 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
<b>SECTION E: FLOW MEASUREMENT</b>	
<b>PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS</b>	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
<b>DETAILS:</b>	
1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: <u>YES</u> TYPE OF DEVICE: <u>18" Parshall Flume w/ staff gauge. Algae on staff gauge make it difficult to read.</u>	<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 type="checkbox"/> Y <input type="checkbox"/> N <input checked="" 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
<b>SECTION F: LABORATORY</b>	
<b>PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS</b>	<input type="checkbox"/> S <input checked="" type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
<b>DETAILS: <u>In-house lab analyzes BOD, TSS, FCB, pH, DO, and TRC.</u></b>	
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 type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT: <u>No calibration records for equipment, meters, or thermometers; records for multi-probe meters stored in meter do not contain required info.</u>	<input type="checkbox"/> Y <input checked="" 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: <u>Ana-Lab Corp</u>	
b. LAB ADDRESS: <u>PO Box 9000, Kilgore, TX 75663</u>	
c. PARAMETERS PERFORMED: <u>NH3-N, NO3 + NO2-N, Total Phosphorus, Total Recoverable Cyanide, and Total Recoverable Selenium</u>	
8. BIOMONITORING PROCEDURES ADEQUATE: <u>American Interplex Corp, 8600 Kanis Rd, Little Rock, AR 72204</u>	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
a. PROPER ORGANISMS USED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
b. PROPER DILUTION SERIES FOLLOWED: <u>Dilution series changes with new design; lab had used old dilution series for new WWTP design in June 2015.</u>	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
c. PROPER TEST METHODS AND DURATION:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
d. RETESTS AND/OR TRE PERFORMED AS REQUIRED: <u>2<sup>nd</sup> Quarter 2015 failed; retest</u>	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE

<b>SECTION G: EFFLUENT/RECEIVING WATERS OBSERVATIONS</b>							
BASED ON VISUAL OBSERVATIONS ONLY						<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE	
DETAILS: <b>Discharging through new plant at Outfall 001.</b>							
OUTFALL #:	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	COLOR	OTHER
001	NO	NO	ALGAE	NO	NO	GREEN	N/A
<b>SECTION H: SLUDGE DISPOSAL</b>							
SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS						<input type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE	
DETAILS: <b>Sludge is being stored in activated sludge basins and flow EQ basin (new converted components); may be affecting treatment process; numerous NH3-N effluent violations.</b>							
1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY: <u>Excessive sludge stored in activated sludge ponds.</u>						<input type="checkbox"/> S <input type="checkbox"/> M <input checked="" type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE	
2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503: <u>Has not been removed in 25+ years.</u>						<input type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
3. FOR LAND APPLIED SLUDGE, TYPE OF LAND APPLIED TO: (E.G., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE): <u>City in the process of bringing sludge press online for land application and landfill options.</u>							
<b>SECTION I: SAMPLING INSPECTION PROCEDURES</b>							
SAMPLE RESULTS WITHIN PERMIT REQUIREMENTS						<input type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
DETAILS:							
1. SAMPLES OBTAINED THIS INSPECTION:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
2. TYPE OF SAMPLE: <input type="checkbox"/> GRAB:___ <input type="checkbox"/> COMPOSITE:___ METHOD:___ FREQUENCY:___							
3. SAMPLES PRESERVED:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
4. FLOW PROPORTIONED SAMPLES OBTAINED:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
6. SAMPLE REPRESENTATIVE OF VOLUME AND NATURE OF DISCHARGE:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
7. SAMPLE SPLIT WITH PERMITTEE:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
<b>SECTION J: STORM WATER POLLUTION PREVENTION PLAN</b>							
STORM WATER MANAGEMENT MEETS PERMIT REQUIREMENTS						<input type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
DETAILS: <b>Part II, Condition 6 requires BMPs to prevent stormwater pollution; inspected under ARR000453.</b>							
1. SWPPP UPDATED AS NEEDED:___ DATE OF LAST UPDATE:___						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
2. SITE MAP INCLUDING ALL DISCHARGES AND SURFACE WATERS:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
3. POLLUTION PREVENTION TEAM IDENTIFIED:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
4. POLLUTION PREVENTION TEAM PROPERLY TRAINED:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
5. LIST OF POTENTIAL POLLUTANT SOURCES:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
6. LIST OF POTENTIAL SOURCES AND PAST SPILLS AND LEAKS:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
7. ALL NON-STORM WATER DISCHARGES ARE AUTHORIZED:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
8. LIST OF STRUCTURAL BMPS:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
9. LIST OF NON-STRUCTURAL BMPS:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
10. BMPS PROPERLY OPERATED AND MAINTAINED:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
11. INSPECTIONS CONDUCTED AS REQUIRED:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	

**FLOW CALCULATION SHEET**

Date: **July 27, 2015**      Time: **13:23**

Head in Inches:      Feet: **0.24**

Type & Size of Primary Flow Measurement Device: **18" Parshall Flume w/ staff gauge**

Name & Model of Secondary Flow Measurement Device: **Teledyne Isco (totalizer)**

Date of last Calibration of Secondary Flow Device: **N/A; monthly checks**

Recorded Flow at Date & Time Listed Above: **299.61 gpm** (Facility Flow Meter)

Calculated Flow at Date & Time Listed Above: **299.9 gpm**

(Flow is calculated using flow charts in: ISCO Open Channel Flow Measurement Handbook-5<sup>th</sup> Edition)

% Error =	Recorded Value	-	Calculated Value	X 100
	Calculated Value			

% Error =	299.61	-	299.9	X 100
	299.9			

% Error =	-0.29	X 100
	299.9	

% Error =	-0.00097	X 100
-----------	----------	-------

% Error =	<b>-0.097</b>	%
-----------	---------------	---

Comments: **Within acceptable +/- 10% range.**



**DMR Calculation Check**

Reporting Period: From 2014 11 01 To 2014 11 30  
 Year Month Day Year Month Day

Parameter Checked: NH3-N

	Loading Mass Mo. Avg. - lbs/day	Concentration Monthly Mo. Avg. - mg/l	7-day Avg. - mg/l
Reported Value:	<u>58</u>	<u>4.95</u>	<u>7.44</u>
Calculated Value:	<u>66</u>	<u>5</u>	<u>7.4</u>
Permit Value:	<u>96</u>	<u>5</u>	<u>7.5</u>

**If calculated value does not equal reported value, explain:  
 Flow measurement for Nov 14, 2014 and Nov 26, 2014 were  
 not converted the same way as all the other flow  
 measurements for Nov 2014. It appears the 6-hr flow is  
 divided by 6 and multiplied by 24 to get the flow for the  
 composite that is used for loading calculations. Example:  
 Nov 12, 2014 6-hr flow is  $0.349/6 = 0.058 \times 24 = 1.396$  used in  
 the loading calculation for  $3.69 \times 1.396 \times 8.34 = 43$  lbs/day.  
 Using this format, Nov 4 is 26 lbs, Nov 14 is 56 lbs, Nov 24 is  
 97 lbs, Nov 25 is 99 lbs, and Nov 25 is 115 lbs.**

**Could not find NH3-N concentrations for Nov 13 and 14, 2014  
 with supplied contract lab analyses sheets; used permittee's  
 spreadsheet values.**

**DMR Calculation Check**

Reporting Period: From 2014 11 01 To 2014 11 30  
 Year Month Day Year Month Day

Parameter Checked: CBOD

	<b>Loading Mass Mo. Avg. - lbs/day</b>	<b>Concentration Monthly Mo. Avg. - mg/l</b>	<b>7-day Avg. - mg/l</b>
Reported Value:	<u>21</u>	<u>1.75</u>	<u>1.91</u>
Calculated Value:	<u>23</u>	<u>2</u>	<u>2</u>
Permit Value:	<u>192</u>	<u>10</u>	<u>15</u>

**If calculated value does not equal reported value, explain:**  
See Nov 2014 NH3-N for flow measurement rationale;  
rounding differences for concentration averages.

**DMR Calculation Check**

**Reporting Period: From**   2014     11     01   **To**   2014     11     30    
   Year      Month      Day                      Year      Month      Day

**Parameter Checked:**   TSS  

	<b>Loading Mass</b>	<b>Concentration</b>	
	<b>Mo. Avg. - lbs/day</b>	<b>Mo. Avg. - mg/l</b>	<b>7-day Avg. - mg/l</b>
<b>Reported Value:</b>	<u>  78  </u>	<u>  7  </u>	<u>  8  </u>
<b>Calculated Value:</b>	<u>  88  </u>	<u>  7  </u>	<u>  8  </u>
<b>Permit Value:</b>	<u>  288  </u>	<u>  15  </u>	<u>  22.5  </u>

**If calculated value does not equal reported value, explain:**  
See Nov 2014 NH3-N for flow measurement rationale.

**Water Division Photographic Evidence Sheet**

Location:	<b>City of Nashville WWTP</b>			
Photographer:	<b>Kerri McCabe</b>	Date:	<b>July 27, 2015</b>	
Witness:	<b>Chip Colston</b>	Time:	<b>1013</b>	
Description:	<b>Influent box directed towards preliminary.</b>		Photo #:	<b>1</b>



Photographer:	<b>Kerri McCabe</b>	Date:	<b>July 27, 2015</b>	
Witness:	<b>Chip Colston</b>	Time:	<b>1014</b>	
Description:	<b>Enclosed bar screen with ejector directed towards dumpster; dumpster needs to be in containment.</b>		Photo #:	<b>2</b>



**Water Division Photographic Evidence Sheet**

Location:	<b>City of Nashville WWTP</b>		
Photographer:	<b>Kerri McCabe</b>	Date:	<b>July 27, 2015</b>
Witness:	<b>Chip Colston</b>	Time:	<b>1019</b>
		Photo #:	<b>3</b>
Description:	<b>East aerated activated sludge basin; note excessive stored sludge (looking West).</b>		



Photographer:	<b>Kerri McCabe</b>	Date:	<b>July 27, 2015</b>
Witness:	<b>Chip Colston</b>	Time:	<b>1021</b>
		Photo #:	<b>4</b>
Description:	<b>East aerated activated sludge basin; note excessive stored sludge (looking East).</b>		



**Water Division Photographic Evidence Sheet**

Location:	<b>City of Nashville WWTP</b>		
Photographer:	<b>Kerri McCabe</b>	Date:	<b>July 27, 2015</b>
Witness:	<b>Chip Colston</b>	Time:	<b>1022</b>
		Photo #:	<b>5</b>
Description:	<b>West aerated activated sludge basin; note excessive stored sludge (looking West).</b>		



Photographer:	<b>Kerri McCabe</b>	Date:	<b>July 27, 2015</b>
Witness:	<b>Chip Colston</b>	Time:	<b>1032</b>
		Photo #:	<b>6</b>
Description:	<b>Flow EQ basin; note excessive algae (green color of water).</b>		



**Water Division Photographic Evidence Sheet**

Location:	<b>City of Nashville WWTP</b>		
Photographer:	<b>Kerri McCabe</b>	Date:	<b>July 27, 2015</b>
Witness:	<b>Chip Colston</b>	Time:	<b>1045</b>
		Photo #:	<b>7</b>
Description:	<b>Primary clarifier with relatively clean weir fingers.</b>		



Photographer:	<b>Kerri McCabe</b>	Date:	<b>July 27, 2015</b>
Witness:	<b>Chip Colston</b>	Time:	<b>1047</b>
		Photo #:	<b>8</b>
Description:	<b>Very little activated sludge coming into primary clarifier; atypical coloration.</b>		



**Water Division Photographic Evidence Sheet**

Location:	<b>City of Nashville WWTP</b>		
Photographer:	<b>Kerri McCabe</b>	Date:	<b>July 27, 2015</b>
Witness:	<b>Chip Colston</b>	Time:	<b>1048</b>
		Photo #:	<b>9</b>
Description:	<b>UV disinfection prior to flow measurement and post-aeration.</b>		



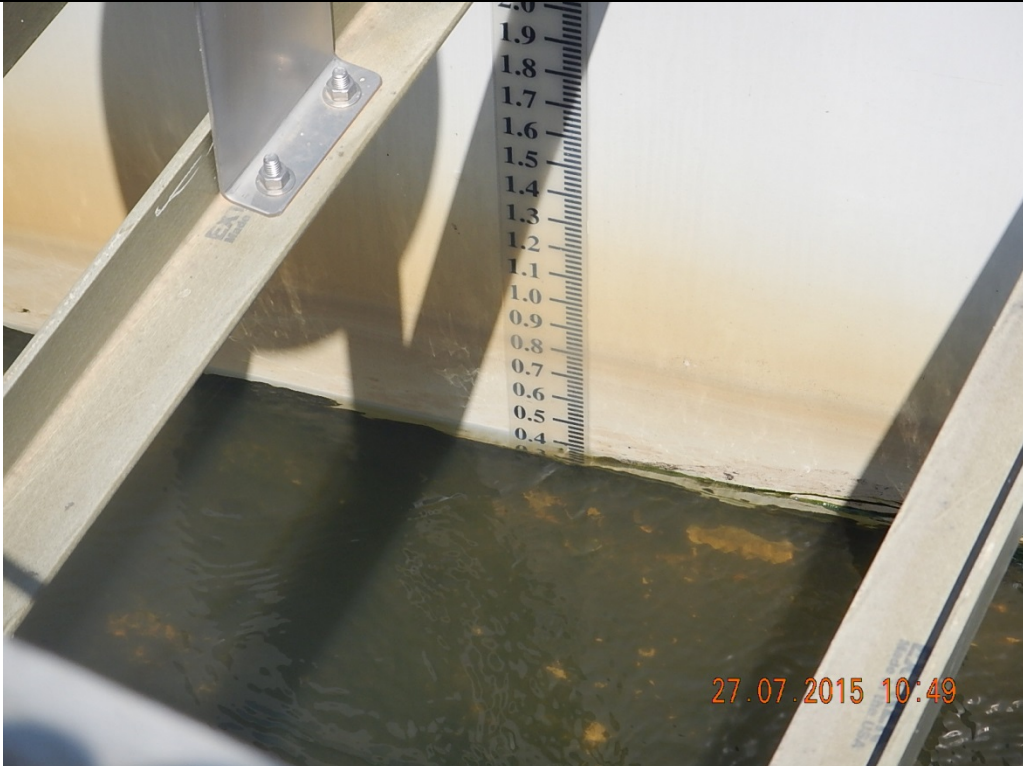
Photographer:	<b>Kerri McCabe</b>	Date:	<b>July 27, 2015</b>
Witness:	<b>Chip Colston</b>	Time:	<b>1049</b>
		Photo #:	<b>10</b>
Description:	<b>Primary (18" Parshall flume) and secondary (totalizer) flow measuring devices.</b>		





**Water Division Photographic Evidence Sheet**

Location:	<b>City of Nashville WWTP</b>		
Photographer:	<b>Kerri McCabe</b>	Date:	<b>July 27, 2015</b>
Witness:	<b>Chip Colston</b>	Time:	<b>1049</b>
		Photo #:	<b>11</b>
Description:	<b>Staff gauge; note excessive algae growing along water level.</b>		



Photographer:	<b>Kerri McCabe</b>	Date:	<b>July 27, 2015</b>
Witness:	<b>Chip Colston</b>	Time:	<b>1051</b>
		Photo #:	<b>12</b>
Description:	<b>Post-aeration (step aeration) after flow measuring devices; note sampler tubing.</b>		



**Water Division Photographic Evidence Sheet**

Location:	<b>City of Nashville WWTP</b>		
Photographer:	<b>Kerri McCabe</b>	Date:	<b>July 27, 2015</b>
Witness:	<b>Chip Colston</b>	Time:	<b>1052</b>
		Photo #:	<b>13</b>
Description:	<b>Automatic sampler and outfall identification.</b>		



Photographer:	<b>Kerri McCabe</b>	Date:	<b>July 27, 2015</b>
Witness:	<b>Chip Colston</b>	Time:	<b>1055</b>
		Photo #:	<b>14</b>
Description:	<b>Sludge belt press for WAS; inactive until sludge is accumulated.</b>		



Figure 1. Google Earth image dated Nov 6, 2014 of the overview of the City of Nashville's WWTP.



Figure 2. Google Earth image dated Nov 6, 2014 of the older components of the City of Nashville's WWTP that have been repurposed.



Figure 3. Google Earth image dated Nov 6, 2014 of the newer components of the City of Nashville's WWTP.



**From:** [McCabe, Kerri](#)  
**To:** [McConnell, Melissa](#)  
**Subject:** FW: City of Nashville Inspection  
**Date:** Friday, August 28, 2015 8:48:55 AM  
**Attachments:** [image001.png](#)

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Melissa,

Please attach this extension to WID 17916 and 17918. I have updated Tracker. Thank you.

## **Kerri McCabe**

Inspector Supervisor  
ADEQ – Water Division  
Field Services – Inspection Branch

Office – (501) 682-0642  
Work Cell – (501) 352-5641  
Fax – (501) 682-0880  
5301 Northshore Drive  
North Little Rock, AR 72118-5317



**From:** Larry Dunaway [mailto:larry19211@gmail.com]  
**Sent:** Wednesday, August 26, 2015 2:22 PM  
**To:** McCabe, Kerri  
**Subject:** Re: City of Nashville Inspection

Kerri,

Thank you for working with us on this. The permits branch has been notified. We enjoyed the visit as well.

Thanks,

Larry

On Wed, Aug 26, 2015 at 12:14 PM, McCabe, Kerri <[MCCABE@adeq.state.ar.us](mailto:MCCABE@adeq.state.ar.us)> wrote:  
Mr. Dunaway,

This email confirms that I have granted you a two week extension to respond to my inspection findings. The new response due date is Sept 14, 2015. Thank you for your assistance in this matter. If you need any additional information or guidance, please feel free to contact me. I enjoyed meeting you and the other gentlemen during the inspection.

Please be advised that you may need to contact Permits Branch regarding the chemical addition for algae/TSS control. Thank you.

**Kerri McCabe**

Inspector Supervisor  
ADEQ – Water Division  
Field Services – Inspection Branch

Office – [\(501\) 682-0642](tel:5016820642)  
Work Cell – [\(501\) 352-5641](tel:5013525641)  
Fax – [\(501\) 682-0880](tel:5016820880)  
5301 Northshore Drive  
North Little Rock, AR 72118-5317



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Larry Dunaway  
Public Works Director  
City of Nashville  
870-845-4015



Nashville Public Works  
Larry Dunaway  
426 N Main St  
Nashville, AR 71852

Cell 870-557-1953  
Office 870-845-4015  
Fax 870-845-7409

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September 2, 2015

ADEQ  
Attn: Water Division Inspection Branch  
5301 Northshore Dr  
North Little Rock, AR 72201

RE: City of Nashville WWTP Inspection  
AFIN: 31-00036 Permit No's: AR0021776, ARR000453, AR0021776C

To Whom It May Concern,

This letter is in response to the "Summary of Findings" for violations noted during the Compliance Evaluation Inspection on July 27, 2015.

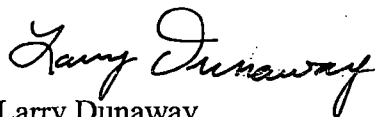
1. We will sample and submit results. Sampling is scheduled for August 31, 2015.
2. The dumpster is being placed inside a secondary containment structure. The collected storm water will be collected via sump pump and routed back to the head works.
3. As of August 15, 2015 TRC has been removed from the laboratory bench sheet.
4. Due to failure of both lethal and reproduction, the dilution/limits would not have affected a change of the test results. As noted in the "Summary of Findings," the contract lab was notified of the changes to the dilution/limits during the inspection.
5. Excessive and old sludge in the extended aeration pond is being removed at this time. It is being transferred to the EQ basin. Pond 2 was completed on August 20, 2015. Pond 1 is scheduled to be done soon.
  - a. The Parshall flume has been scheduled to be cleaned on a weekly basis.

[Recipient Name]  
September 2, 2015  
Page 2

- b. A shade cover will be installed to protect the secondary flow measuring device and electronics from the sun and rain.
  - c. The algae are being addressed by adding a coagulant to aid in flocculation and settling. ADEQ has been notified.
  - d. The existing floatables and other solid waste will be removed and disposed of properly.
  - e. The City will continue to address the I & I during heavy rain events with camera, cleaning, and rehabilitation.
  - f. The EQ basin has been pumped down to allow for more storage capacity.
6. The lab bench sheet has been remodeled to reflect these problems. Times are now immediately recorded.
- a. We have purchased the 22<sup>nd</sup> Edition of Standard Methods.
  - b. A calibration lab bench sheet has been developed and a new NIST thermometer has been purchased.
  - c. The pH buffer 10 was disposed of and new ordered. A chemical lab bench sheet has been developed.
  - d. A calibrated thermometer has been placed in the automatic sampler.
7. The lab bench sheet has been totally revamped to correct these violations.
8. The lab technician is in the process of developing a separate bench sheet to come into compliance with all requirements of the permits.

If you have any questions please give me a call at one of my numbers listed above.

Thank you,



Larry Dunaway  
Public Works Director  
City of Nashville



**Nashville Public Works**

426 North Main Street  
Nashville, AR 71852

*Address Correction Requested*

SHREVEPORT

LA 710

08 SEP '15

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ADEQ  
Attn: Water Division Inspection Branch  
5301 Northshore Drive  
North Little Rock AR 72118-5317

# ADEQ

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

September 18, 2015

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

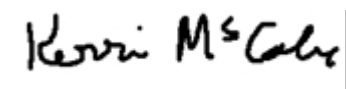
**RE: City of Nashville WWTP Inspections (Howard Co)**  
**AFIN: 31-00036**                      **Permit No.: AR0021776**  
**AR0021776C**

Dear Mr. Dunaway:

I have reviewed the responses pertaining to my July 27, 2015 inspections of the City of Nashville WWTP. 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) 682-0642 or you may e-mail me at [mccabe@adeq.state.ar.us](mailto:mccabe@adeq.state.ar.us).

Sincerely,



Kerri McCabe  
Inspector Supervisor  
Water Division