



ARKANSAS
Department of Environmental Quality

March 17, 2016

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

RE: City of Huntsville Inspection
AFIN: 44-00018 Permit No.: AR0022004

Dear Mr. Garrett:

On February 23, 2016, David Long, U.S. EPA Region 6 Environmental Scientist, Water Division District 1 Inspector Matt Holden, and I a Compliance Evaluation 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. A copy of the inspection report is enclosed for your records.


Please refer to the "Summary of Findings" section of the attached inspection report 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 **March 30, 2016**.

If I can be of any assistance, please contact me at west@adeq.state.ar.us or 479.267.0811, ext. 12.

Sincerely,

A handwritten signature in cursive script that reads "Alison West".

Alison West
District 1 Field Inspector
Water Division

 A R K A N S A S Department of Environmental Quality		WATER DIVISION INSPECTION REPORT					
		AFIN: 44-00018		PERMIT #: AR0022004		DATE: 2/23/2016	
		COUNTY: 44 Madison			PDS #: 089718		MEDIA: WN
		GPS LAT: N36.11184 LONG: W-93.73275 LOCATION: Entrance					
FACILITY INFORMATION				INSPECTION INFORMATION			
NAME: City of Huntsville LOCATION: 30187 Madison Hwy 23 CITY: Huntsville				FACILITY TYPE: 1 - Municipal		INSPECTOR ID#: 14939 T-Joint State/EPA-State Lead	
				FACILITY EVALUATION RATING: 2 - Marginal		INSPECTION TYPE: Compliance Evaluation	
RESPONSIBLE OFFICIAL				DATE(S): 2/23/2016		ENTRY TIME: 09:20	
				DATE(S): 2/25/2016		ENTRY TIME: 13:25	
NAME / TITLE: Mr. Larry Garrett / Water Utilities Director COMPANY: City of Huntsville MAILING ADDRESS: P.O. Box 430 CITY, STATE, ZIP: Huntsville AR 72740 PHONE & EXT. / FAX: 479.738.6929 / EMAIL:				EXIT TIME: 13:30		PERMIT EFFECTIVE DATE: 6/1/2011	
				EXIT TIME: 14:45		PERMIT EXPIRATION DATE: 5/31/2014	
CONTACTED DURING INSPECTION: Yes				FAYETTEVILLE SHALE RELATED: N			
				FAYETTEVILLE SHALE VIOLATIONS: N			
				INSPECTION PARTICIPANTS			
				NAME/TITLE/PHONE/FAX/EMAIL/ETC.: Larry Garrett, Water Utilities Director (Feb. 23 and 25) David Long, U.S. EPA (Feb. 23) Matt Holden, District 1 Field Inspector (Feb. 23) Bill Eoff, Wastewater Plant Manager (Feb. 25)			
AREA EVALUATIONS							
(S=Satisfactory, M=Marginal, U=Unsatisfactory, N=Not Applicable/Evaluated)							
S	PERMIT	S	FLOW MEASUREMENT	N	STORMWATER		
M	RECORDS/REPORTS	S	LABORATORY	M	FACILITY SITE REVIEW		
M	OPERATION & MAINTENANCE	S	EFFLUENT/RECEIVING WATER	M	SELF-MONITORING PROGRAM		
M	SAMPLING	S	SLUDGE HANDLING/DISPOSAL	N	PRETREATMENT		
**	OTHER:						
SUMMARY OF FINDINGS							
<ol style="list-style-type: none"> 1. Sample collection dates and times were being recorded on the chain-of-custody record prior to actual sample collection thus creating a false record. Sample collection dates and times must be recorded as they occur, not hours/days in advance. Part III, Section C, 8 of the permit specifies the required record contents. Part III, Section C, 4 of the permit specifies penalties for Tampering and Part III, Section D, 13 of the permit specifies penalties for Falsification of Records. Observations of a chain-of-custody on February 23, 2016, at approximately 10:30 a.m. revealed the following: <ol style="list-style-type: none"> a. An effluent composite sample for CBOD5, TSS, and TDS collected on February 24, 2016 from 10 a.m.-1 p.m. This is a future sample date. b. Influent CBOD5 and TSS grab samples collected at 8:35 a.m. on February 24, 2016. This is a future sample date. c. Effluent sample time for nitrite + nitrate nitrogen indicate a composite time from 10 a.m.-1p.m on February 23, 2016. Sample collection was underway however, the composite sample removal time cannot be recorded until after the sampling is complete. d. Operator had signed name to the relinquished section of the Chain-of-Custody form. Signature, Date and Times in the Relinquished By section should only be completed when the samples are being relinquished to the laboratory and not prior to. 2. Records show monitoring Nitrite + Nitrate exceeded permit limits, violating Part I, Section A of your permit. Specifically, the monthly average and 7 day average were exceeded in October 2015. These excursions have been reported to the Department and no further action is required. 3. Records were reviewed from August 2015 through January 2016. The facility was in violation of Part III, Section C, Condition 8 for the following: <ol style="list-style-type: none"> a. No sample collection time on Total Phosphorous collected on September 9, 2015. b. No analyst, analysis date and analysis time for fecal coliform on sample collected October 7, 2015. c. Preservative not recorded for nitrite + nitrate on November 17, 2015 and Ammonia Nitrogen 							

4. Dissolved Oxygen and pH monitoring were not conducted according to test procedures approved under 40 CFR 136. This is in violation of Part III, C, 3 of the permit.
 - a. pH was not analyzed within the 15 minute holding times for the following date: December 22, 2015, January 6, 2016, and January 20, 2016.
 - b. Dissolved Oxygen was not analyzed within the 15 minute holding times for the following dates: August 25, 2015.
5. Clarifier Number 1 (south) was visibly short circuiting at the time of the inspection. Immediate repairs should be made to the unit to restore it to working condition. This is in violation of Part III, B, 1a of the permit.
6. Excessive vegetation was observed in the sludge drying beds; this vegetation must be removed to ensure that the treatment units are properly maintained. This is a violation of Part III. Section B.1 of the permit.

GENERAL COMMENTS

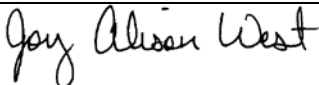

On February 23, 2016, David Long, U.S. EPA Region 6 Environmental Scientist, Water Division District 1 Inspector Matt Holden, and I performed a Compliance Evaluation Inspection at the above referenced facility. Larry Garrett, Water Utilities Director, gave us a tour of the facility. On February 25, 2016, I conducted a follow-up inspection with Mr. Garrett and Bill Eoff, Wastewater Plant Manager. Records were reviewed at the facility and office.

Although a No Exposure Certification Inspection was not conducted at the time of the inspection, the Department discussed the following:

- a. Need to clean solids at the headworks and UV Disinfection.
- b. Lime was observed on the ground near silo as well as lime dust in air and covering grass.
- c. Open dumpster exposed to precipitation.

It is strongly recommended that the facility develop a management plan to ensure the No Exposure Certification is maintained.

In addition, pH calibration records are stored within meter. However, facility does not believe this information is backed up if lightning strikes, etc. Thus, records must be maintained of pH calibration. The records should include buffer readings, temperature, and slope.

INSPECTOR'S SIGNATURE: 	-Alison West	DATE: 3-16-2016
SUPERVISOR'S SIGNATURE: 	Jason Bolenbaugh	DATE: 3/17/2016

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

☐S ☒M ☐U ☐NA ☐NEDETAILS: **Preservative was not recorded for nitrite + nitrate on November 17, 2015 and Ammonia Nitrogen on August 31, 2015.**

1. 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: **No sample collection time on Total Phosphorous collected on September 9, 2015.** ☐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: **D.O. Standard method needs to be updated to the May 18, 2012 Federal Register.** ☒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: **Analysis date and analysis time for fecal coliform on sample collected October 7, 2015** ☐Y ☒N ☐NA ☐NE
- h. NAME OF PERSON(S) PERFORMING ANALYSES: **Analyst was not documented for fecal coliform on sample collected on October 7, 2015.** ☐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 ☐NEDETAILS: **Clarifier Number 2 was visibly short circuiting at the time of the inspection. Excessive vegetation was observed in the sludge drying beds.**

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: **Generator at plant checked weekly/Portable back-up for lift stations** ☒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: ☐Y ☒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

SECTION D: SAMPLING

PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS

☐S ☒M ☐U ☐NA ☐NE

DETAILS: pH was not analyzed within the 15 minute holding times for the following date: December 22, 2015, January 6, 2016, and January 20, 2016. Dissolved Oxygen was not analyzed within the 15 minute holding times for the following dates: August 25, 2015.

- | | |
|---|--|
| 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: | <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 type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| a. SAMPLES REFRIGERATED DURING COMPOSITING: | <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: | <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 |

SECTION E: FLOW MEASUREMENT

PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS

☒S ☐M ☐U ☐NA ☐NE

DETAILS:

- | | |
|--|--|
| 1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: __ TYPE OF DEVICE: <u>2 Foot H Flume</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 checked="" type="checkbox"/> Y <input type="checkbox"/> N <input 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 |

SECTION F: LABORATORY

PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS

☒S ☐M ☐U ☐NA ☐NE

DETAILS:

- | | |
|--|--|
| 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 type="checkbox"/> NA <input checked="" type="checkbox"/> NE |
| 3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT: | <input checked="" type="checkbox"/> Y <input 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>Environmental Services Company, Inc.</u> | <u>American Interplex</u> |
| b. LAB ADDRESS: <u>1107 Century Avenue, Springdale, AR 72762</u> | <u>8600 Kanis Road, Little Rock, AR 72204</u> |
| c. PARAMETERS PERFORMED: <u>Ammonia Nitrogen, Total Phosphorous, Nitrate + Nitrite, CBOD, TSS, TDS</u> | <u>Chronic WET Testing</u> |
| 8. BIOMONITORING PROCEDURES ADEQUATE: | <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: | <input checked="" type="checkbox"/> Y <input 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: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |

SECTION G: EFFLUENT/RECEIVING WATERS OBSERVATIONS

BASED ON VISUAL OBSERVATIONS ONLY

☒S ☐M ☐U ☐NA ☐NE

DETAILS:

OUTFALL #:	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	COLOR	OTHER
001	None	None	None	Slight	None	Clear	--

SECTION H: SLUDGE DISPOSAL

SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS

☒S ☐M ☐U ☐NA ☐NEDETAILS: Facility is authorized to land-apply biosolids under Permit Tracking No. 5157-W.

- | | |
|---|---|
| 1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY: | <input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503: | <input type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE |
| 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

☐S ☐M ☐U ☒NA ☐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 |

SECTION J: STORM WATER POLLUTION PREVENTION PLAN

STORM WATER MANAGEMENT MEETS PERMIT REQUIREMENTS

☐S ☐M ☐U ☐NA ☒NEDETAILS: The facility has a No Exposure Certification. Permit Tracking Number is ARR000005.

- | | |
|--|--|
| 1. SWPPP UPDATED AS NEEDED:___ DATE OF LAST UPDATE:___ | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE |
| 2. SITE MAP INCLUDING ALL DISCHARGES AND SURFACE WATERS: | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE |
| 3. POLLUTION PREVENTION TEAM IDENTIFIED: | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE |
| 4. POLLUTION PREVENTION TEAM PROPERLY TRAINED: | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE |
| 5. LIST OF POTENTIAL POLLUTANT SOURCES: | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE |
| 6. LIST OF POTENTIAL SOURCES AND PAST SPILLS AND LEAKS: | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE |
| 7. ALL NON-STORM WATER DISCHARGES ARE AUTHORIZED: | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE |
| 8. LIST OF STRUCTURAL BMPS: | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE |
| 9. LIST OF NON-STRUCTURAL BMPS: | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE |
| 10. BMPS PROPERLY OPERATED AND MAINTAINED: | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE |
| 11. INSPECTIONS CONDUCTED AS REQUIRED: | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE |

FLOW CALCULATION SHEET

Date:	2-23-2016	Time:	10:13	
Head in Inches:		Feet:	0.84	
Type & Size of Primary Flow Measurement Device:				
2 Foot H Flume				
Name & Model of Secondary Flow Measurement Device:				Chessel Eurotherm Model 392
Date of last Calibration of Secondary Flow Device:				12-8-2015
Recorded Flow at Date & Time Listed Above:				1.054 MGD (Facility Flow Meter)
Calculated Flow at Date & Time Listed Above:				0.9888 MGD
(Flow is calculated using flow charts in: <u>ISCO Open Channel Flow Measurement Handbook-5th Edition</u>)				
% Error =	Recorded Value	-	Calculated Value	X 100
	Calculated Value			
% Error =	1.054	-	0.9888	X 100
	0.9888			
% Error =	0.0652	X 100		
	.09888			
% Error =	0.0659	X 100		
% Error =	6.59	%		
Comments:				



DMR Calculation Check


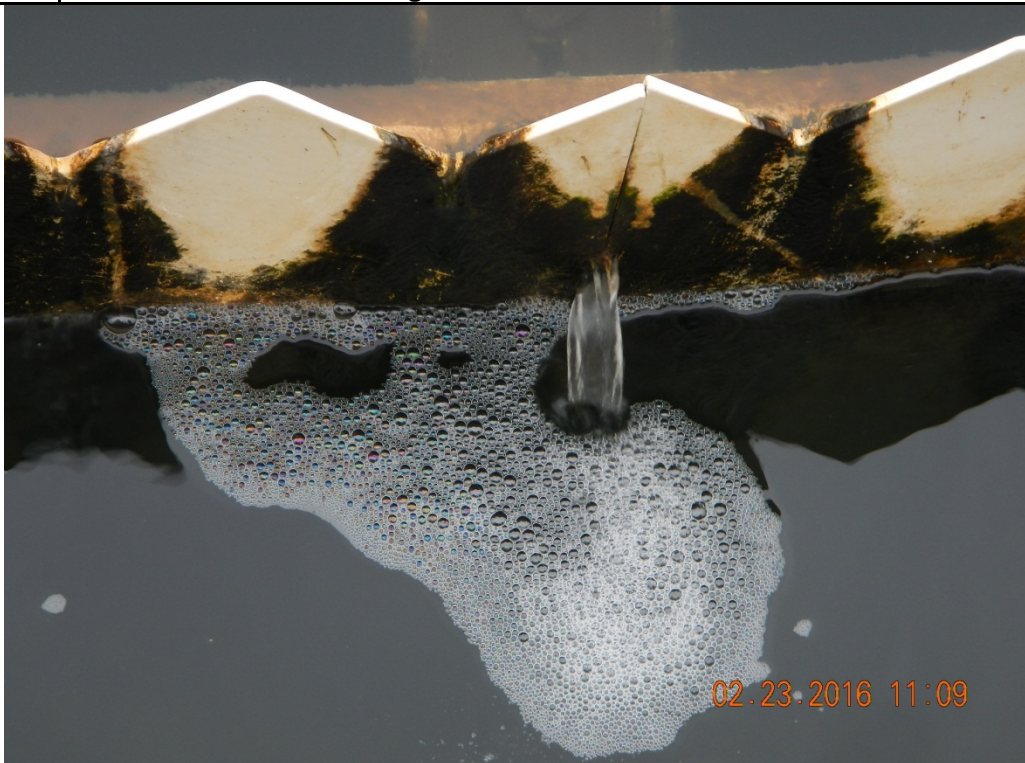
Reporting Period:	From	<u>2015</u>	<u>10</u>	<u>01</u>	To	<u>2015</u>	<u>10</u>	<u>31</u>
		Year	Month	Day		Year	Month	Day

Parameter Checked: NH3-N

	Loading Mass	Concentration Monthly	
	Mo. Avg. - lbs/day	Mo. Avg. - mg/l	7-day Avg. - mg/l
Reported Value:	<u>3.1</u>	<u>0.5</u>	<u>0.8</u>
Calculated Value:	<u>3.1</u>	<u>0.5</u>	<u>0.8</u>
Permit Value:	<u>26.7</u>	<u>1.6</u>	<u>3.9</u>

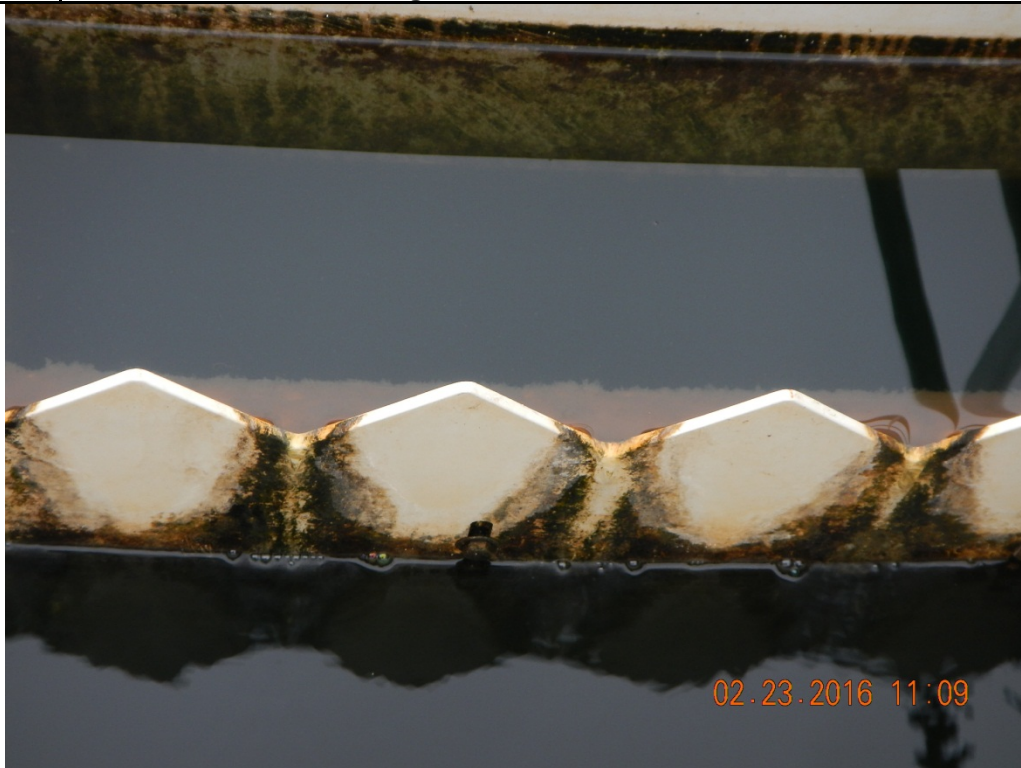
If calculated value does not equal reported value, explain:

Water Division Photographic Evidence Sheet					
Location:	City of Huntsville				
Photographer:	Alison West	Date:	2-23-2016	Time:	09:46
Witness:	Matt Holden, David Long			Photo #:	3
Description:	DSCN5275. Solids on ground near influent structure.				
 <p>A photograph showing a pile of dry leaves, sticks, and debris on the ground. A blue tarp is partially visible among the leaves. A timestamp in the bottom right corner reads "02.23.2016 10:46".</p>					
Photographer:	Alison West	Date:	2-23-2016	Time:	09:56
Witness:	Matt Holden, David Long			Photo #:	4
Description:	DSCN5295. Lime on the ground near lime silo.				
 <p>A photograph of a large, cylindrical, light-colored metal silo. A person is standing near the base of the silo. The ground in the foreground is covered with a layer of white lime. A timestamp in the bottom right corner reads "02.23.2016 10:56".</p>					

Water Division Photographic Evidence Sheet					
Location:	City of Huntsville				
Photographer:	Alison West	Date:	2-23-2016	Time:	09:56
Witness:	Matt Holden, David Long			Photo #:	5
Description:	DSCN5296. Lime dust in air and covering grass.				
					
Photographer:	Alison West	Date:	2-23-2016	Time:	10:09
Witness:	Matt Holden, David Long			Photo #:	6
Description:	DSCN5314. Short circuiting in Clarifier No. 2.				
					

Water Division Photographic Evidence Sheet

Location:	City of Huntsville		
Photographer:	Alison West	Date:	2-23-2016
Witness:	Matt Holden, David Long	Time:	10:09
		Photo #:	7
Description:	DSCN5313. Short circuiting in Clarifier No. 2.		



Photographer:	Alison West	Date:	2-23-2016
Witness:	Matt Holden, David Long	Time:	10:12
		Photo #:	8
Description:	DSCN5321. Solids on the ground near UV disinfection.		



Water Division Photographic Evidence Sheet

Location:	City of Huntsville		
Photographer:	Alison West	Date:	2-23-2016
Witness:	Matt Holden, David Long	Time:	10:16
		Photo #:	9
Description:	DSCN5324. Flow device and post aeration prior to receiving stream.		



Photographer:	Alison West	Date:	2-23-2016
Witness:	Matt Holden, David Long	Time:	10:18
		Photo #:	10
Description:	DSCN5329. Slight foam in receiving stream at Outfall 001.		



Water Division Photographic Evidence Sheet

Location:	City of Huntsville		
Photographer:	Alison West	Date:	2-23-2016
Witness:	Matt Holden, David Long	Time:	10:19
		Photo #:	11
Description:	DSCN5329. Slight foam in receiving stream at Outfall 001.		



Photographer:	Alison West	Date:	2-23-2016
Witness:	Matt Holden, David Long	Time:	11:02
		Photo #:	12
Description:	DSCN5339. Waste in sludge drying bed from clarifier scum pumps.		



ADEQ

03/24/2016

Attention Water Division

5301 Northshore Drive

North Little Rock, AR 72118-5317

RE: Compliance inspection report

AFIN: 44-00018, NPDES No. AR0022004

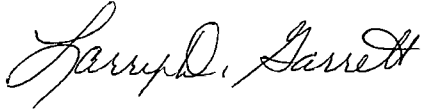
This is in response to the compliance inspection that took place at our facility on February 23rd 2016 with Matt Holden and Alison West with A.D.E.Q. and David Long with U.S. E.P.A. Region 6.

1. The operator that filled out the chain of custody ahead of time, after speaking with the operator we feel that he was being overzealous with no ill intent. We have spoken with the operator and explained the importance of making sure that ALL paper work is conscientiously filled out properly and have been assured that this will not happen again in the future.
2. We were under a heavy loading at the time of this event from our industry that was in Turkey Fresh Season, we consulted with them as soon as we found out and they reduced their loading to us. Also we spoke with our engineers about this and they believe that an upgrade to our recycle pump station will help us to better deal with occasional heavy loading issues in the future. We are in the process of going to bid for this upgrade.
3. a. thru c. We have spoken with our operators about these issues and further trained them on the importance of properly filling out paperwork in the future.
4. a. and b. We have spoken with our operators to make sure they analyze their samples in the proper time period. Also we have added the proper time frame to the lab bench sheet for a constant reminder.
5. We have our engineers working on the best way to solve this problem. We are going to try caulking these cracks as a temporary fix until a permanent fix can be established.
6. We are discussing with engineers about how to address this situation. We only need to use 1 or 2 of these for our scum removal, the rest we may take completely out of service.

Also, we have changed our pH bench and calibration sheet to include the calibration points and the slope of the calibration so there will be a hard copy back up in case the meter fails.

Please contact us at any time if you have any questions or concerns.

Sincerely,

A handwritten signature in cursive script that reads "Larry D. Garrett".

Larry D. Garrett

Director

Huntsville Water Utilities

water@madisoncounty.net

479-738-6929



ARKANSAS
Department of Environmental Quality

March 17, 2016

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

RE: City of Huntsville Inspection
AFIN: 44-00018 Permit No.: AR0022004

Dear Mr. Garrett:

On February 23, 2016, David Long, U.S. EPA Region 6 Environmental Scientist, Water Division District 1 Inspector Matt Holden, and I a Compliance Evaluation 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. A copy of the inspection report is enclosed for your records.


Please refer to the "Summary of Findings" section of the attached inspection report 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 **March 30, 2016**.

If I can be of any assistance, please contact me at west@adeq.state.ar.us or 479.267.0811, ext. 12.

Sincerely,

A handwritten signature in cursive script that reads "Jay Alison West".

Alison West
District 1 Field Inspector
Water Division

 A R K A N S A S Department of Environmental Quality		WATER DIVISION INSPECTION REPORT					
		AFIN: 44-00018		PERMIT #: AR0022004		DATE: 2/23/2016	
		COUNTY: 44 Madison		PDS #: 089718		MEDIA: WN	
		GPS LAT: N36.11184 LONG: W-93.73275 LOCATION: Entrance					
FACILITY INFORMATION				INSPECTION INFORMATION			
NAME: City of Huntsville LOCATION: 30187 Madison Hwy 23 CITY: Huntsville				FACILITY TYPE: 1 - Municipal		INSPECTOR ID#: 14939 T-Joint State/EPA-State Lead	
				FACILITY EVALUATION RATING: 2 - Marginal		INSPECTION TYPE: Compliance Evaluation	
				DATE(S): 2/23/2016		ENTRY TIME: 09:20	
				EXIT TIME: 13:30		PERMIT EFFECTIVE DATE: 6/1/2011	
RESPONSIBLE OFFICIAL NAME: / TITLE Mr. Larry Garrett / Water Utilities Director COMPANY: City of Huntsville MAILING ADDRESS: P.O. Box 430 CITY, STATE, ZIP: Huntsville AR 72740 PHONE & EXT: / FAX: 479.738.6929 / EMAIL:				DATE(S): 2/25/2016		ENTRY TIME: 13:25	
				EXIT TIME: 14:45		PERMIT EXPIRATION DATE: 5/31/2014	
CONTACTED DURING INSPECTION: Yes				FAYETTEVILLE SHALE RELATED: N			
				FAYETTEVILLE SHALE VIOLATIONS: N			
				INSPECTION PARTICIPANTS			
				NAME/TITLE/PHONE/FAX/EMAIL/ETC.: Larry Garrett, Water Utilities Director (Feb. 23 and 25) David Long, U.S. EPA (Feb. 23) Matt Holden, District 1 Field Inspector (Feb. 23) Bill Eoff, Wastewater Plant Manager (Feb. 25)			
AREA EVALUATIONS							
(S=Satisfactory, M=Marginal, U=Unsatisfactory, N=Not/Applicable/Evaluated)							
S	PERMIT	S	FLOW MEASUREMENT	N	STORMWATER		
M	RECORDS/REPORTS	S	LABORATORY	M	FACILITY SITE REVIEW		
M	OPERATION & MAINTENANCE	S	EFFLUENT/RECEIVING WATER	M	SELF-MONITORING PROGRAM		
M	SAMPLING	S	SLUDGE HANDLING/DISPOSAL	N	PRETREATMENT		
**	OTHER:						
SUMMARY OF FINDINGS							
<ol style="list-style-type: none"> Sample collection dates and times were being recorded on the chain-of-custody record prior to actual sample collection thus creating a false record. Sample collection dates and times must be recorded as they occur, not hours/days in advance. Part III, Section C, 8 of the permit specifies the required record contents. Part III, Section C, 4 of the permit specifies penalties for Tampering and Part III, Section D, 13 of the permit specifies penalties for Falsification of Records. Observations of a chain-of-custody on February 23, 2016, at approximately 10:30 a.m. revealed the following: <ol style="list-style-type: none"> An effluent composite sample for CBOD5, TSS, and TDS collected on February 24, 2016 from 10 a.m.-1 p.m. This is a future sample date. Influent CBOD5 and TSS grab samples collected at 8:35 a.m. on February 24, 2016. This is a future sample date. Effluent sample time for nitrite + nitrate nitrogen indicate a composite time from 10 a.m.-1p.m on February 23, 2016. Sample collection was underway however, the composite sample removal time cannot be recorded until after the sampling is complete. Operator had signed name to the relinquished section of the Chain-of-Custody form. Signature, Date and Times in the Relinquished By section should only be completed when the samples are being relinquished to the laboratory and not prior to. Records show monitoring Nitrite + Nitrate exceeded permit limits, violating Part I, Section A of your permit. Specifically, the monthly average and 7 day average were exceeded in October 2015. These excursions have been reported to the Department and no further action is required. Records were reviewed from August 2015 through January 2016. The facility was in violation of Part III, Section C, Condition 8 for the following: <ol style="list-style-type: none"> No sample collection time on Total Phosphorous collected on September 9, 2015. No analyst, analysis date and analysis time for fecal coliform on sample collected October 7, 2015. Preservative not recorded for nitrite + nitrate on November 17, 2015 and Ammonia Nitrogen 							

Inspection Report: City of Huntsville, AFIN: 44-00018, Permit #: AR0022004
on August 31, 2015.

4. Dissolved Oxygen and pH monitoring were not conducted according to test procedures approved under 40 CFR 136. This is in violation of Part III, C, 3 of the permit.
 - a. pH was not analyzed within the 15 minute holding times for the following date: December 22, 2015, January 6, 2016, and January 20, 2016.
 - b. Dissolved Oxygen was not analyzed within the 15 minute holding times for the following dates: August 25, 2015.
5. Clarifier Number 1 (south) was visibly short circuiting at the time of the inspection. Immediate repairs should be made to the unit to restore it to working condition. This is in violation of Part III, B, 1a of the permit.
6. Excessive vegetation was observed in the sludge drying beds; this vegetation must be removed to ensure that the treatment units are properly maintained. This is a violation of Part III. Section B.1 of the permit.

GENERAL COMMENTS

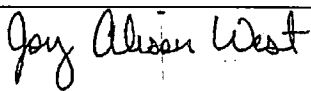
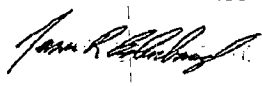
On February 23, 2016, David Long, U.S. EPA Region 6 Environmental Scientist, Water Division District 1 Inspector Matt Holden, and I performed a Compliance Evaluation Inspection at the above referenced facility. Larry Garrett, Water Utilities Director, gave us a tour of the facility. On February 25, 2016, I conducted a follow-up inspection with Mr. Garrett and Bill Eoff, Wastewater Plant Manager. Records were reviewed at the facility and office.

Although a No Exposure Certification Inspection was not conducted at the time of the inspection, the Department discussed the following:

- a. Need to clean solids at the headworks and UV Disinfection.
- b. Lime was observed on the ground near silo as well as lime dust in air and covering grass.
- c. Open dumpster exposed to precipitation.

It is strongly recommended that the facility develop a management plan to ensure the No Exposure Certification is maintained.

In addition, pH calibration records are stored within meter. However, facility does not believe this information is backed up if lightning strikes, etc. Thus, records must be maintained of pH calibration. The records should include buffer readings, temperature, and slope.

INSPECTOR'S SIGNATURE: 	-Alison West	DATE: 3-16-2016
SUPERVISOR'S SIGNATURE: 	Jason Bolenbaugh	DATE: 3/17/2016

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

☐S ☒M ☐U ☐NA ☐NE

DETAILS: Preservative was not recorded for nitrite + nitrate on November 17, 2015 and Ammonia Nitrogen on August 31, 2015.

1. 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: No sample collection time on Total Phosphorous collected on September 9, 2015. ☐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: D.O. Standard method needs to be updated to the May 18, 2012 Federal Register. ☒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: Analysis date and analysis time for fecal coliform on sample collected October 7, 2015 ☐Y ☒N ☐NA ☐NE
- h. NAME OF PERSON(S) PERFORMING ANALYSES: Analyst was not documented for fecal coliform on sample collected on October 7, 2015. ☐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

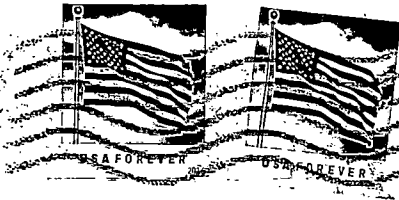
☐S ☒M ☐U ☐NA ☐NE

DETAILS: Clarifier Number 2 was visibly short circuiting at the time of the inspection. Excessive vegetation was observed in the sludge drying beds.

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: Generator at plant checked weekly/Portable back-up for lift stations ☒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: ☐Y ☒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

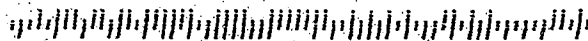
Huntsville Water Utilities
PO Box 430
Huntsville, AR
72740

NORTHWEST AR P&DF
AR 727 1.1
25 MAR 2016 PM



ARKANSAS Department of Environmental Quality
Water Division Enforcement
5301 Northshore Drive
North Little Rock, AR 72118-5317

72118-5317





April 1, 2016

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

RE: Adequate Response-City of Huntsville Inspection
AFIN: 44-00018 Permit No.: AR0022004

Dear Mr. Garrett:

I have reviewed the response pertaining to my February 23, 2016 inspection of the above referenced facility. The information provided sufficiently addresses the violation 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,

A handwritten signature in black ink that reads "Jay Alison West". The signature is written in a cursive, flowing style.

Alison West
District 1 Inspector
Water Division