

April 20, 2016

Honorable Robert Tharp, Mayor City of Decatur P.O. Box 247 Decatur, AR 72722

RE: City of Decatur Wastewater Treatment Facility Inspection

AFIN: 04-00052 Permit No.: AR0022292

Dear Mayor Tharp:

On April 4, 2016, I performed 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 emailed to <a href="Water-Inspection-Report@adeq.state.ar.us">Water-Inspection-Report@adeq.state.ar.us</a>. 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 May 4, 2016.

If I can be of any assistance, please contact me at <a href="https://holden@adeq.state.ar.us">holden@adeq.state.ar.us</a> or 479-267-0811, ext. 16.

Sincerely,

Matt Holden

District 1 Field Inspector

Water Division

ADEQ ARKANSAS			WATER	? [	DIVISION I	NSP	ECTION	REPORT	
			AFIN: <b>04-00052</b> PERMIT #: <b>AR00222</b>			292		DATE: <b>4/4/2016</b>	
			UNTY: <b>04 Ben</b>	ito	n	PDS #	#: 090317	MEDIA: WN	
De	Department of Environmental Quality GPS LAT: 36.344165				5 LONG: -94.472	711 L	OCATION: <b>G</b>	eneral Area	
FACILITY INFORMATION					IN	SPECT	TION INFORM	MATION	
City of Decatur Wastewater Treatment Facility  LOCATION:				FACILITY TYPE: INSPECTOR ID#: 102078 S - State					
98	5 Austin Ave.				facility evaluation rating  1 - Unsatisfacto		Comp	Diance Evaluation	
De	catur, AR 72722				* *	TRY TIME:	EXIT TIME: 11:50	PERMIT EFFECTIVE DATE:	
	RESPONSIBLE OFFIC	CIAL	•		,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	0.00		10/1/2014 PERMIT EXPIRATION DATE:	
NAME: / TITLE								9/30/2019	
	norable Robert Tharp / Mayor	-	FAYETTEVILLE SHALE RELATED: N						
	y of Decatur			-	FAYETTEVILLE SHALE VIOLATIONS: N				
	ING ADDRESS:  D. Box 247			-	INSPECTION PARTICIPANTS				
	STATE, ZIP:				NAME/TITLE/PHONE/FAX/EMAIL/ETC.:				
	catur AR 72722				James Boston/City of Decatur Director of Public Works/479-752-8336/jboston.cod@gmail.com Mike Liley/Wastewater Supervisor				
	NE & EXT: / FAX: 9-752-8336 /								
EMAI					Andrew French/Lab Operator				
	oston.cod@gmail.com						porator		
CC	INTACTED DURING INSPECTION:	Yes							
	(S=Si	atisfac			LUATIONS sfactory, N=Not Applicable/	/Evaluated	)		
S	PERMIT	S	FLOW MEASI			N	STORMWA <sup>*</sup>	TER	
**	RECORDS/REPORTS	S	LABORATOR			**	FACILITY S	ITE REVIEW	
S	OPERATION & MAINTENANCE	**			EIVING WATER	**		TORING PROGRAM	
S	SAMPLING	S	SLUDGE HAN	NDI	LING/DISPOSAL	N	PRETREAT	MENT	
**	OTHER:								
	SUMMARY OF FINDINGS								

The following violations were observed at the time of inspection:

- 1. Violation of Part I.A. of your permit. Specifically, the following items were noted:
  - a. December 2015 Discharge Monitoring Report (DMR) indicates the facility had one excursion each for the following: Total Suspended Solids (TSS), Ammonia Nitrogen, and Fecal Coliform.
  - b. January 2016 DMR indicates the facility had one excursion for Ammonia Nitrogen.
  - c. February 2016 DMR indicates the facility had one excursion for Fecal Coliform.
  - d. Solids were observed at Outfall 001 in the receiving stream.
- 2. Review of the December 2015 to February 2016 DMRs indicates the facility is not reporting monitoring results accurately on DMRs. This is in violation of Part III.C.5. of your permit. Specifically, the following items were noted:
  - a. The December 2015 DMR indicates the facility reported one excursion for the following: TSS, and Ammonia Nitrogen; however, the facility had two excursions for TSS (monthly average loading mass and 7-day average concentration) and three excursions Ammonia Nitrogen (monthly average loading mass, monthly average concentration, and 7-day average concentration).
  - b. The January 2015 DMR indicates the facility reported one excursion for Ammonia Nitrogen; however, the facility had three excursions for Ammonia Nitrogen (monthly average loading mass, monthly average concentration, and 7-day average concentration).
  - c. The February 2015 DMR indicates the facility had zero excursions for Ammonia Nitrogen; however, the facility had two excursions for Ammonia Nitrogen (monthly average loading mass and monthly average concentration).

In addition, the facility used the wrong analytical sample value when calculating TSS monthly average loading mass and monthly average concentration for February 2016. The sample result for TSS on 2/16/2016 was 4.40 mg/L, and the facility used 0.12 mg/L when calculating the monthly average loading mass and monthly average concentration. However, using the correct value would not have resulted in an excursion for TSS monthly average loading mass and monthly average concentration. Please be advised the facility must calculate the monthly average loading mass and monthly average concentration using the correct values and lab analysis results. Also, please be advised the facility must specifically report all permit excursions to the Department in a non-compliance report.

#### **GENERAL COMMENTS**

On April 4, 2016, I conducted a compliance evaluation inspection at the above referenced facility. I conducted a facility site tour with Mike Liley, Wastewater Supervisor. At the time of inspection, solids were observed at Outfall 001 in the receiving stream. I reviewed the last two quarters of 2015 Biomonitoring reports, as well as December 2015 to February 2016 Discharge Monitoring Reports (DMRs), Chain of Custody (COC), lab analyses, and DMR calculation spreadsheets.

INSPECTOR'S SIGNATURE: \*

**Matt Holden** 

DATE: **04/15/2016** 

SUPERVISOR'S SIGNATURE:

←Click text to left to add signature

-Supervisor Name

DATE:

SECTION A: PERMIT VERIFICATION	
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS	⊠S □M □U □NA □NE
DETAILS:	
1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE:	Øy □n □na □ne
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES:	□Y □N ☑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:	•
1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS:	□Y ☑N □NA □NE
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE:	ØS □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:	☑Y □N □NA □NE
d. ANALYTICAL METHODS AND TECHNIQUES:	☑Y □N □NA □NE
e. RESULTS OF CALIBRATIONS:	☑Y □N □NA □NE
f. RESULTS OF ANALYSES:	☑Y □N □NA □NE
g. DATES AND TIMES OF ANALYSES:	☑Y □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:	Øs □m □u □na □ne
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA:	□Y ØN □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:	⊠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:	Øy □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: Reported on DMR	☑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: Reported on DMR	☑Y □N □NA □NE

SI	ECTION D: SAMPLING	
ΡI	ERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS	⊠S □M □U □NA □NE
DI	ETAILS:	
1.	SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT:	☑Y □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:	☑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
á	a. SAMPLES REFRIGERATED DURING COMPOSITING:	☑Y □N □NA □NE
-	b. PROPER PRESERVATION TECHNIQUES USED:	☑Y □N □NA □NE
(	c. CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136:	☑Y □N □NA □NE
7.	IF MONITORING IS PERFORMED MORE OFTEN THAN REQUIRED ARE RESULTS REPORTED ON THE DMR:	□y □n ☑na □ne
SI	ECTION E: FLOW MEASUREMENT	
PI	ERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS	☑S □M □U □NA □NE
D	ETAILS:	
1.	PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: TYPE OF DEVICE: 9" Parshall Flum	e DY DN DNA DNE
2.	FLOW MEASURED AT EACH OUTFALL AS REQUIRED:	⊠y □n □na □ne
3.	SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED:	☑Y □N □NA □NE
4.	CALIBRATION FREQUENCY ADEQUATE:	☑Y □N □NA □NE
5.	RECORDS MAINTAINED OF CALIBRATION PROCEDURES:	☑Y □N □NA □NE
6.	CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE:	☑Y □N □NA □NE
7.	FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE:	⊠y □n □na □ne
8.	FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES:	☑Y □N □NA □NE
9.	HEAD MEASURED AT PROPER LOCATION:	☑Y □N □NA □NE
SI	ECTION F: LABORATORY	
PI	ERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS	☑S □M □U □NA □NE
	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
	a. LAB NAME: Environmental Services Co., Inc. Pace Analytical Services, Inc.	
	b. LAB ADDRESS: 1107 Century Ave., Springdale, AR 72762 9608 Loiret Blvd., Lenexa, KS 66219	
(	c. PARAMETERS PERFORMED: NH3-N, NO2+NO3, TP, CBOD, FCB, TSS Biomonitoring	
8.	BIOMONITORING PROCEDURES ADEQUATE: Last 2 quarters of 2015 reviewed.	Øy □n □na □ne
	a. PROPER ORGANISMS USED:	☑Y □N □NA □NE
ı	b. PROPER DILUTION SERIES FOLLOWED:	Øy □n □na □ne
	c. PROPER TEST METHODS AND DURATION:	Øy □n □na □ne
	d. RETESTS AND/OR TRE PERFORMED AS REQUIRED:	☑Y □N □NA □NE

Inspection Report. City of Decatur Wastewater Treatment Facility, AFIN. 04-00052, Permit #. AR0022232											
SECTION G: EFFLUENT/RECEIVING WATERS OBSERVATIONS											
BASED ON VISUAL OBSERVATIONS ONLY											
DETAILS: Solids observed in receiving stream at Outfall 001.											
OUTFALL #:	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	S COLOR OTHER					
001	No	No	No	Slight	Present	Clear					
SECTION H: SLUDGE DISPOSAL											
SLUDGE I	DISPOSAL MEI	ETS PERMIT F	REQUIREMEN <sup>*</sup>	TS		⊠s □m □	IU □NA □NE				
DETAILS:	Land applied in	<u>n Missouri</u>									
1. SLUDGE N	MANAGEMENT ADEQU	ATE TO MAINTAIN EF	FLUENT QUALITY:			⊠s □m	□U □NA □NE				
2. SLUDGE R	RECORDS MAINTAINED	O AS REQUIRED BY 40	) CFR 503:			□s □м	□U □NA ☑NE				
3. FOR LAND	APPLIED SLUDGE, T	YPE OF LAND APPLIE	O TO: (E.G., FOREST,	AGRICULTURAL, PUI	BLIC CONTACT SITE):						
	SAMPLING IN										
	RESULTS WITH	HIN PERMIT R	EQUIREMENT	S			IU ⊠NA □NE				
DETAILS:											
2. TYPE OF S	2. TYPE OF SAMPLE: □GRAB:_ □COMPOSITE:_ METHOD:_ FREQUENCY:										
3. SAMPLES											
4. FLOW PRO	4. FLOW PROPORTIONED SAMPLES OBTAINED:										
5. SAMPLE C	BTAINED FROM FACI	LITY'S SAMPLING DE\	/ICE:				□N ☑NA □NE				
6. SAMPLE R	REPRESENTATIVE OF	VOLUME AND NATUR	E OF DISCHARGE:				□N ☑NA □NE				
7. SAMPLE S	PLIT WITH PERMITTE	E:					□N ☑NA □NE				
8. CHAIN-OF	-CUSTODY PROCEDU	RES EMPLOYED:					□N ☑NA □NE				
9. SAMPLES	9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT:										
	: STORM WAT										
	ATER MANAG	EMENT MEET	S PERMIT RE	QUIREMENTS	5		IU □NA ☑NE				
DETAILS:											
	PDATED AS NEEDED:_						□N □NA ☑NE				
_	INCLUDING ALL DISCH		CE WATERS:				□N □NA ☑NE				
	N PREVENTION TEAM						□N □NA ☑NE				
	N PREVENTION TEAM		):				□N □NA ☑NE				
	OTENTIAL POLLUTAN						□N □NA ☑NE				
	OTENTIAL SOURCES						□N □NA ☑NE				
	STORM WATER DISCH	IARGES ARE AUTHOR	IZED:				□N □NA ☑NE				
	TRUCTURAL BMPS:						ON ONA MINE				
	ON-STRUCTURAL BMF						ON ONA MINE				
	OPERLY OPERATED A						□N □NA ☑NE				
11. INSPECTION	ONS CONDUCTED AS	REQUIRED:				ЦΥ	□N □NA ☑NE				

		FLOW CA	ALCULATIO	N SHEET						
Date: <b>04/</b>	04/2016	Time: <b>11:</b>	22							
Head in Inc	hes: <b>12.6</b>	Feet:	1.05							
Type & Size	Type & Size of Primary Flow Measurement Device: 9" Parshall Flume									
	odel of Seconda Calibration of S	•		,		Ultrasonic consistently < +/-				
Calculated	Flow at Date & T	Time Listed	Above: 14	9 GPM 185 GPM		Facility Flow Meter)				
% Error =	Recorded Val	ue - Calo	culated Valu	e X 100						
% Error =	1399	-   1485	1485	X 100						
% Error =	-86 1485	X 100								
% Error =	0579	X 100								
% Error =	-5.79	%								
Comments:										

## Inspection Report: City of Decatur Wastewater Treatment Facility, AFIN: 04-00052, Permit #: AR0022292 DMR Calculation Check

Reporting Period:	From	2016	02	01	_ To	2016	02	29	
		Year	Month	Day		Year	Month	Day	
Parameter Checked:		TSS	_						
	Loading			Concentration					
	Mass			Monthly					
	Mo.	Avg Ibs/	day	Mo. A	vg r	mg/l	7-day Avg	g mg/l	
Reported Value: 138.2				8.05			16.17		
Calculated Value: 144.189				8.41			16.17		
Permit Value:	275.2			15			22.5		

If calculated value does not equal reported value, explain:

Facility used the wrong analytical sample value for TSS on 2/16/2016, which resulted in the wrong reported value for monthly average loading mass and monthly average concentration. Sample result for TSS on 2/16/2016 was 4.40 mg/L, and facility used 0.12 mg/L when calculating monthly concentration. Using the correct value would not have resulted in an excursion for TSS.

# Inspection Report: City of Decatur Wastewater Treatment Facility, AFIN: 04-00052, Permit #: AR0022292 DMR Calculation Check

Reporting Period:	From	2016	01	01	То	2016	01	31
		Year	Month	Day		Year	Month	Day
Parameter Checked:		mmonia litrogen	-					
		Loading				Concer	ntration	
		Mass				Mor	ithly	

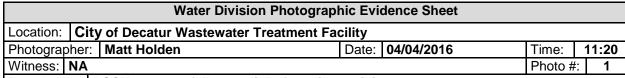
 Mo. Avg. - Ibs/day
 Mo. Avg. - mg/l
 7-day Avg. - mg/l

 Reported Value:
 182.3
 9.7
 16.9

 Calculated Value:
 182.3
 9.7
 16.9

 Permit Value:
 75.2
 4.1
 10.3

If calculated value does not equal reported value, explain:



Description: DSCN9446. Outfall 001, slight foam in receiving stream.

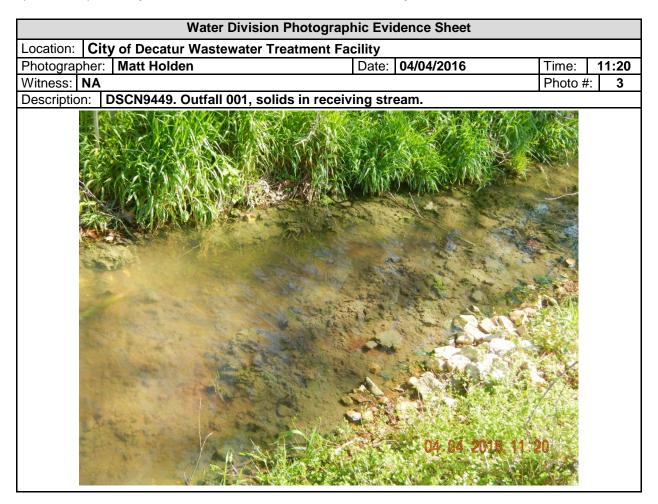


 Photographer:
 Matt Holden
 Date:
 04/04/2016
 Time:
 11:20

 Witness:
 NA
 Photo #:
 2







Phone: 479.752.3912



May 4, 2016

Mr. Matt Holden
District 1 Field Inspector
5301 Northshore Drive
North Little Rock, AR 72118-5317

RE: Decatur AR Inspection Report Response. AFIN: 04-00052, Permit No: AR0022292

Dear Mr. Holden,

This is our response to your Compliance Evaluation on April 4, 2016 and the findings that you had for our facility at 985 Austin Avenue.

I will explain most of the violations you found mainly with our DMR reporting forms in the summary below. They will hopefully explain Violation 1 section a, b, c. and Violation 2 section a, b, and c.

Since I have been doing DMR's I have always understood the excursions to be a violation of the seven day average only. I will follow this up with a phone call for further clarification soon. But from your findings I now understand an excursion on the DMR to be any violation whether it be pounds per day, thirty day average, or seven day average. An example would be let's say on phosphorus I was out on my poundage, thirty day average and one week on seven day average, that would be 3 excursions. The way I previously would have reported this, it would have been only one excursion, with the other two items poundage and 30 day average listed in my NC report.

As to Item 1 d. this problem with solids build up around the outfall happened predominately before the Actiflow went online toward the end of 2015. This year we have not had the flooding rains like we normally have by now. Our new Actiflow is doing a very good job on TSS now.

All of the above violations we are striving to make the corrections. If you have any questions on any of my comments please call me at 479-752-3912.

Sincerely,

James Boston

**Public Works Manager** 

City of Decatur

### **Decatur Water & Waste Water** P.O. Box 247 • 310 Maple Ave. Decatur, AR 72722



Hrkansas Dept. of Environmental Quality Water Division-Enforcement Branch 5301 Northshore Drive North Little Rock, AR 72118-5317

Attn: Matt Holden

721188E317



May 23, 2016

Honorable Robert Tharp, Mayor City of Decatur P.O. Box 247 Decatur, AR 72722

RE: Response to Inspection

AFIN: 04-00052 Permit No. AR0022292

Dear Mayor Tharp:

I have reviewed the response pertaining to my April 4, 2016 inspection of the City of Decatur Wastewater Treatment Facility. The information provided sufficiently addresses the violations referenced in my inspection report. At this time the Department has no further comment concerning this particular inspection. Acceptance of this response by the Department does not preclude any future enforcement action deemed necessary at this site or any other site.

If we need further information concerning this matter, we will contact you. Thank you for your attention to this matter. Should you have any questions, feel free to contact me at 479-267-0811, ext. 16 or you may e-mail me at <a href="mailto:holden@adeq.state.ar.us">holden@adeq.state.ar.us</a>.

Sincerely,

Matt Holden
District 1 Inspector

Office of Water Quality