



ARKANSAS  
Department of Environmental Quality

May 23, 2016

Mike Spencer, Wastewater Supervisor  
City of Mena  
323 Polk 53  
Mena, AR 71953

**RE: City of Mena Wastewater Plant Inspections (Polk Co)**  
**AFIN: 57-00423** **Permit No.: AR0036692**  
**ARR000145**  
**AR0036692C**  
**ARR150000**  
**57-00290** **5207-W**

Dear Mr. Spencer:


On April 5-6 and 25, 2016, I performed a Compliance Evaluation Inspection, a Compliance Sampling Inspection, a Collection System Inspection, an Industrial Stormwater Inspection, a State WWTP Construction Inspection, a Small Construction Site Inspection, and a Land Application 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 **June 6, 2016**.

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

 <b>A R K A N S A S</b> Department of Environmental Quality		<b>WATER DIVISION INSPECTION REPORT</b>					
		AFIN: 57-00423		PERMIT #: AR0036692		DATE: 5/6/2016	
		COUNTY: 57 Polk			PDS #: 090883		MEDIA: WN
		GPS LAT: 34.556208 LONG: -94.188032 LOCATION: Entrance					
<b>FACILITY INFORMATION</b>				<b>INSPECTION INFORMATION</b>			
NAME: <b>Mena Wastewater Plant</b> LOCATION: <b>323 Polk 53</b> CITY: <b>Mena, 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>	
<b>RESPONSIBLE OFFICIAL</b>				DATE(S): <b>4/6/2016</b>		ENTRY TIME: <b>09:30</b>	
				EXIT TIME: <b>13:45</b>		PERMIT EFFECTIVE DATE: <b>3/1/2012</b>	
NAME / TITLE: <b>Mike Spencer / Wastewater Supervisor</b> COMPANY: <b>City of Mena</b> MAILING ADDRESS: <b>323 Polk 53</b> CITY, STATE, ZIP: <b>Mena AR 71953</b> PHONE & EXT: / FAX: <b>479-234-2592 /</b> EMAIL: <b>menawwtp@gmail.com</b> CONTACTED DURING INSPECTION: <b>Yes</b>				PERMIT EXPIRATION DATE: <b>2/28/2017</b>			
				FAYETTEVILLE SHALE RELATED: <b>N</b>			
				FAYETTEVILLE SHALE VIOLATIONS: <b>N</b>			
				<b>INSPECTION PARTICIPANTS</b>			
				NAME/TITLE/PHONE/FAX/EMAIL/ETC.: <b>Mike Spencer (Lic# 007917)/WW Supervisor/(479) 234-2592/menawwtp@gmail.com</b>			
<b>AREA EVALUATIONS</b>							
(S=Satisfactory, M=Marginal, U=Unsatisfactory, N=Not Applicable/Evaluated)							
<b>S</b>	PERMIT	<b>S</b>	FLOW MEASUREMENT	<b>S</b>	STORMWATER		
<b>M</b>	RECORDS/REPORTS	<b>S</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>S</b>	PRETREATMENT		
<b>**</b>	OTHER:						
<b>SUMMARY OF FINDINGS</b>							
<p>The following violations were noted during the inspection:</p> <p>1.) Facility failed to collect/analyze samples during discharge from Outfall 001 for Oct 2015. Records indicate that a discharge from Outfall 001 was occurring on Oct 1, Oct 2, and Oct 20-23; however, effluent samples were not collected/analyzed. This is a violation of Part I, Section A of the permit.</p> <p>2.) Bypasses of treatment from Lagoon #2 to the former outfall structure downstream of the permitted Outfall 001 occurred in Oct 2015. There is no record of these bypasses being reported to the ADEQ. Flow records for Oct 2015 indicate no flow from the permitted Outfall 001 for several days in Oct 2015. Bypasses at the WWTP were reported on the online SSO Report for May 24-25, 2015; May 28-29, 2015; and Dec 27-29, 2015. This is a violation of Part III, Section B, 4, B. of the permit. Bypasses exceeding effluent limits must be reported to the Department. This is demonstrated by collecting/analyzing bypass discharge.</p> <p>3.) Flow records for Oct 2015 were handwritten in a notebook and only contained the date and totalized flow. This is a violation of Part III, Section C, 8 of the permit. Records should contain all items listed in Part III, Sec C, 8, A-F of the permit. Operator has a flow recording spreadsheet that contains all the required information and this form needs to be used for recording flow.</p> <p>4.) Several bypasses occurred at the WWTP in 2015. Three of these bypasses were reported on the online SSO Report form (May and Dec 2015) and two other bypasses were not reported (Oct 2015). A bypass is not a sanitary sewer overflow, and instances of bypass require specific reporting procedures. This is a violation of Part III, Section D, 6, A-B of the permit.</p>							

**GENERAL COMMENTS**

On Wednesday, April 6, 2016 a compliance inspection was conducted with the above-mentioned inspection participants. The inspection consisted of a site assessment and a records review.

**Site assessment:**

Treatment consists of automatic bar screen, main lift station, primary aerated (fine bubble diffusion) stabilization pond (25 acres), secondary aerated (fine bubble diffusion) stabilization pond (30 acres), polymer/coagulant addition, four (4) upflow continuous backwash rapid sand filters, chlorine gas disinfection, post-aeration via two (2) gravity static aerators, and discharge. Per a flow diagram submitted with the permit renewal application (March 2016), the facility has two bypass options: from the main lift station to Lagoon #2 and from Lagoon #2 to the receiving stream. The facility discharged via Lagoon #2 in Oct 2015 due to substantial precipitation (bypassed filtration and disinfection; not reported to Enforcement Branch).

The City has recently completed the construction of the geotube staging area for the dewatering of sludge, which will be land applied under State No-Discharge permit 5207-W.

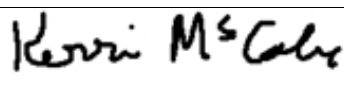
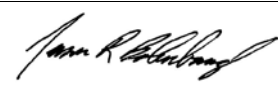
Overall, the site was well-maintained. However, the City-operated animal control facility has constructed a waste pit for animal waste. This waste pit overflows, commingles with stormwater, and discharges downstream of the permitted outfall (upstream of the bypass outfall). Additionally, personnel from the animal control facility have stored materials outside at the adjacent WWTP property.

The in-house laboratory is clean and well-organized.

**Records review:**

The City samples/analyzes the following permit parameters: flow, TSS, DO, FCB, TRC, and pH. The City participates in the DMR Quality Assurance (DMR-QA) Study 36 program (results provided). There was no bench sheet documenting flow for Oct 2015. The Operator requires staff to perform daily flow accuracy checks and totalized flow is documented in a notebook, but it does not contain all info required by Part III, Sec C, 8. A-F. of the permit. Operator does have a spreadsheet for recording flow and needs to use this form for recording flow.

DMR check was conducted for April and Oct 2015. The Oct 2015 data indicate that samples were not collected for two weeks in Oct even though there was a discharge from Outfall 001. The Operator stated that a bypass had occurred in Oct 2015 from Lagoon #2 directly to the receiving stream. The monthly SSO Report for Oct 2015 indicates no overflows of the collection system. Excessive I&I of the collection system would indicate that a bypass was necessary to prevent levee failure of Lagoon #2. Per Gina Porter, Enforcement Analyst, no report for a bypass in Oct 2015 is documented for the City of Mena.

INSPECTOR'S SIGNATURE: 	Kerri McCabe	DATE: 5/23/2016
SUPERVISOR'S SIGNATURE: 	Jason Bolenbaugh	DATE: 5/23/2016

<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:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT: <u>Old outfall structure utilized for bypass when needed.</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: <u>Oct 2015 flow records recorded in notebook; need to use spreadsheet with required information.</u>	
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 checked="" 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:	<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 checked="" type="checkbox"/> Y <input 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:	<input checked="" type="checkbox"/> S <input 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 type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input checked="" 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:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED: <u>Onsite generator (200hp).</u>	<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 (1) Class III/Adv. Industrial and one (1) Class I.</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 type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE
9. STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED:	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE
10. PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED: <u>Retain in lagoons; no EQ.</u>	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
11. HAVE <u>BYPASSES</u> /OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR: <u>Bypasses from Lagoon #2 to receiving stream in May 2015, Oct 2015, and Dec 2015.</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: <u>Submitted online SSO Report for May and Dec 2015 bypasses; did not report Oct 2015 bypasses to Enforcement Branch.</u>	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
13. HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS: <u>Bypasses due to I&amp;I of collection system and excessive precipitation in 2015; Corrective Action Plan (CAP) scheduled for June 2016.</u>	<input type="checkbox"/> Y <input checked="" 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>	
PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS	<input type="checkbox"/> S <input checked="" type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
DETAILS: <u>Operator samples/analyzes flow, TSS, DO, FCB, TRC, and pH; all other parameters contracted.</u>	
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: <u>Discharge from Outfall 001 was not sampled for two weeks in Oct 2015.</u>	<input type="checkbox"/> Y <input checked="" 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:	<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 checked="" type="checkbox"/> Y <input 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: <u>Process control sampling does not have to be reported.</u>	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
<b>SECTION E: FLOW MEASUREMENT</b>	
PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
DETAILS:	
1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: <u>YES</u> TYPE OF DEVICE: <u>90deg V-notch weir</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: <u>Milltronics HydroRanger (totalizer)</u>	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
4. CALIBRATION FREQUENCY ADEQUATE: <u>Last calibrated May 1, 2015.</u>	<input 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: <u>Operator has staff conduct accuracy checks daily.</u>	<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>	
PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
DETAILS: <u>Operator samples/analyzes flow, TSS, DO, FCB, TRC, and pH; all other parameters contracted.</u>	
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:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
4. QUALITY CONTROL PROCEDURES ADEQUATE: <u>DMR-QA results provided.</u>	<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>Data Testing, Inc.</u>	<u>American Interplex Corp</u>
b. LAB ADDRESS: <u>3434 Country Club, Fort Smith AR, 72903</u>	<u>8600 Kanis Rd, Little Rock, AR 72204</u>
c. PARAMETERS PERFORMED: <u>CBOD5, NH3-N, TP, and NO3+NO2-N: Total Recoverable Cu</u>	
8. BIOMONITORING PROCEDURES ADEQUATE: <u>Huther &amp; Associates, Inc., 1156 N Bonnie Brae, Denton, TX 76201</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:	<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 type="checkbox"/> Y <input type="checkbox"/> N <input checked="" 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>Observed at sample location and receiving stream.</b>							
OUTFALL #:	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	COLOR	OTHER
001	NO	NO	NO	NO	Algae	Greenish	N/A
<b>SECTION H: SLUDGE DISPOSAL</b>							
SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS						<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE	
DETAILS: <b>Recently constructed staging area for geotubes to dewater removed sludge prior to land application (5027-W).</b>							
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: <u>Scheduled to land apply in 2016-2017; last removed in 2004.</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>Agricultural</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: <b>See separate CSI report for two days of sampling.</b>							
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 #7 requires BMPs; inspected under IGP ARR000145; see comments regarding run-on from animal control facility.</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: <b>April 6, 2016</b>						Time: <b>1146</b>			
Head in Inches:				Feet: <b>0.91'</b>					
Type & Size of Primary Flow Measurement Device: <b>90deg V-notch weir</b>									
Name & Model of Secondary Flow Measurement Device:						<b>Milltronics HydroRanger (totalizer)</b>			
Date of last Calibration of Secondary Flow Device:						<b>May 1, 2015</b>			
Recorded Flow at Date & Time Listed Above:					<b>882.4 gpm</b>		(Facility Flow Meter)		
Calculated Flow at Date & Time Listed Above:					<b>886.3 gpm</b>				
(Flow is calculated using flow charts in: <u>ISCO Open Channel Flow Measurement Handbook-5<sup>th</sup> Edition</u> )									
% Error =	Recorded Value		-	Calculated Value		X 100			
	Calculated Value								
% Error =	882.4		-	886.3		X 100			
	886.3								
% Error =	-3.9		X 100						
	886.3								
% Error =	-0.004		X 100						
% Error =	<b>-0.4</b>		%						
Comments: <b>Acceptable (reporting under); within +/- 10% range.</b>									





## DMR Calculation Check

Reporting Period:	From	<u>2015</u>	<u>04</u>	<u>01</u>	To	<u>2015</u>	<u>04</u>	<u>30</u>
		Year	Month	Day		Year	Month	Day

**Parameter Checked:** **Cu, Total Recoverable**

	Loading Mass (lbs/day) Mo. Avg.	Concentration (µg/l) Mo. Avg.      7-Day Avg.	
Reported Value:	<u>0.04</u>	<u>2.3</u>	<u>2.3</u>
Calculated Value:	<u>0.04</u>	<u>2.3</u>	<u>2.3</u>
Permit Value:	0.3	10.5	21



**If calculated value does not equal reported value, explain:**

**Values are the same;  $(0.0023 \times 2.2 \times 8.34 = 0.04 \text{ lbs/day})$**



Water Division Photographic Evidence Sheet					
Location:	<b>Mena Wastewater Plant</b>				
Photographer:	<b>Kerri McCabe</b>	Date:	<b>April 6, 2016</b>	Time:	<b>1142</b>
Witness:	<b>Mike Spencer</b>			Photo #:	<b>1</b>
Description:	<b>Automatic bar screen (preliminary) at headworks.</b>				
					
Photographer:	<b>Kerri McCabe</b>	Date:	<b>April 6, 2016</b>	Time:	<b>1050</b>
Witness:	<b>Mike Spencer</b>			Photo #:	<b>2</b>
Description:	<b>Lagoon #1 (primary) with baffles and fine bubble diffusers.</b>				
					



Water Division Photographic Evidence Sheet					
Location:	<b>Mena Wastewater Plant</b>				
Photographer:	<b>Kerri McCabe</b>	Date:	<b>April 6, 2016</b>	Time:	<b>1102</b>
Witness:	<b>Mike Spencer</b>			Photo #:	<b>3</b>
Description:	<b>Lagoon #2 at intake with baffles and fine bubble diffusers.</b>				
					
Photographer:	<b>Kerri McCabe</b>	Date:	<b>April 6, 2016</b>	Time:	<b>1107</b>
Witness:	<b>Mike Spencer</b>			Photo #:	<b>4</b>
Description:	<b>Old preliminary components now used to keep fishes from entering rapid sand filters.</b>				
					



Water Division Photographic Evidence Sheet					
Location:	<b>Mena Wastewater Plant</b>				
Photographer:	<b>Kerri McCabe</b>	Date:	<b>April 6, 2016</b>	Time:	<b>1111</b>
Witness:	<b>Mike Spencer</b>			Photo #:	<b>5</b>
Description:	<b>Chamber for polymer/coagulant addition; note clumping algae.</b>				
 <p>A photograph showing a long, rectangular concrete channel filled with green, murky water. A shadow of the person taking the photo is cast onto the water's surface. In the background, there are concrete structures and some trees. A timestamp '06.04.2016 11:11' is visible in the bottom right corner of the photo.</p>					
Photographer:	<b>Kerri McCabe</b>	Date:	<b>April 6, 2016</b>	Time:	<b>1130</b>
Witness:	<b>Mike Spencer</b>			Photo #:	<b>6</b>
Description:	<b>Effluent from rapid sand filter; backwash routed back to headworks.</b>				
 <p>A photograph showing a rectangular concrete channel with blue-painted walls. The water inside is dark and turbulent. A metal structure with a pump or filter is visible in the foreground. A timestamp '06.04.2016 11:30' is visible in the bottom right corner of the photo.</p>					



**Water Division Photographic Evidence Sheet**

Location:	<b>Mena Wastewater Plant</b>		
Photographer:	<b>Kerri McCabe</b>	Date:	<b>April 6, 2016</b>
Witness:	<b>Mike Spencer</b>	Time:	<b>1133</b>
		Photo #:	<b>7</b>
Description:	<b>Effluent at 90deg V-notch weir and after chlorine disinfection.</b>		



Photographer:	<b>Kerri McCabe</b>	Date:	<b>April 6, 2016</b>
Witness:	<b>Mike Spencer</b>	Time:	<b>1134</b>
		Photo #:	<b>8</b>
Description:	<b>Two static gravity aerators for post-aeration; effluent sampled in corner.</b>		





**Water Division Photographic Evidence Sheet**

Location:	<b>Mena Wastewater Plant</b>		
Photographer:	<b>Kerri McCabe</b>	Date:	<b>April 6, 2016</b>
Witness:	<b>Mike Spencer</b>	Time:	<b>1107</b>
		Photo #:	<b>9</b>
Description:	<b>Old primary/secondary devices prior to outfall; now used for bypass at Lagoon #2.</b>		



Photographer:	<b>Kerri McCabe</b>	Date:	<b>April 6, 2016</b>
Witness:	<b>Mike Spencer</b>	Time:	<b>1108</b>
		Photo #:	<b>10</b>
Description:	<b>Discharge pipe at bypass structure from Lagoon #2.</b>		





**Water Division Photographic Evidence Sheet**

Location:	<b>Mena Wastewater Plant</b>		
Photographer:	<b>Kerri McCabe</b>	Date:	<b>April 6, 2016</b>
Witness:	<b>Mike Spencer</b>	Time:	<b>1108</b>
		Photo #:	<b>11</b>
Description:	<b>Discharge pipe for bypass structure at Lagoon #2; downstream of Outfall 001.</b>		





**Figure 1. Google Earth image dated Nov 6, 2016 showing overview of the City of Mena POTW and major structures.**



**Figure 2. Google Earth image dated Nov 6, 2016 showing close-up of the City of Mena POTW and major structures.**



**Figure 3. NH3-N calculations for Oct 2015 for Outfall 001 (used flow from daily lab sheet).**

Date	Concentration (mg/l)	7-day Average (mg/l)	Daily Flow (MGD)	Mass (lbs/day)
8	0.14	0.155	0.73	0.852348
9	0.17		0.8	1.13424
12	0.13	0.135	0.79	0.856518
13	0.14		0.78	0.910728
27	0.37	0.37	1.1	3.39438
28	0.37		1	3.0858
MAX	0.37		MAX	3.39438
MIN	0.13		MIN	0.852348
Average	0.22		Average	1.705669

**Figure 4. TSS calculations for April 2015 for Outfall 001 (used flow from daily lab sheet).**

Date	Concentration (mg/l)	7-day Average (mg/l)	Daily Flow (MGD)	Mass (lbs/day)
1	4	7	2.21	73.7256
2	10		2.15	179.31
8	5	6.5	1.57	65.469
9	8		1.62	108.0864
14	8	9	2.64	176.1408
15	10		3.77	314.418
21	8	8.5	3.4	226.848
22	9		2.31	173.3886
28	7	5	2.98	173.9724
29	3		2.9	72.558
MAX	10		MAX	314.418
MIN	3		MIN	65.469
Average	7.2		Average	156.39168





**CERTIFIED MAIL: 91 7199 9991 7035 3562 2104**

July 21, 2016

Mike Spencer, Wastewater Supervisor  
City of Mena  
323 Polk 53  
Mena, AR 71953

**Re: Failure to Respond to Inspections (Polk Co)**  
**AFIN: 57-00423**                      **NPDES Permit No.: AR0036692**  
**AR0036692C**  
**ARR150000**

Dear Mr. Spencer:

A letter dated May 23, 2016 was sent by the ADEQ to the City of Mena. The letter outlined the findings of my April 6, 2016 inspections of the above-referenced facility and associated permits. The letter requested that a written response be submitted to the Water Division Inspection Branch of this Department by June 6, 2016. To date, no response has been received for the Compliance Evaluation Inspection for AR0036692 or the Construction Stormwater Inspection for ARR150000. The consulting engineer did provide an adequate response to the State WWTP Construction inspection, and no further response is required regarding this inspection.

Please submit a written response by **August 4, 2016**. Copies of the applicable inspection reports have been included for your convenience.

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,

A handwritten signature in black ink that reads "Kerri McCabe". The signature is written in a cursive style and is enclosed within a rectangular box.

Kerri McCabe  
Inspector Supervisor  
Water Division

**From:** [Mike Spencer](#)  
**To:** [Water-Inspection-Report](#)  
**Subject:** Ar0036692  
**Date:** Monday, July 25, 2016 6:45:41 AM

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With reference to inspection summary of findings

Page 2. 1) Logs reveal that plant was not online during time frame listed in October 2015 and that is why samples not collected.

Page 2. 2) Bypasses have been reported via online server and phone calls and follow up letter. The City is experiencing extremely high rate I and I up to 650%. All bypasses will be reported via proper channels and City is developing a plan to try to drop the I and I rate coming to plant.

Page 2.3) All flows are being recorded via notebook and also daily computer excel spreadsheet, since inspector was on site.

Page 2.4) All bypasses in future will be reported as per permit requirements.

Storm water permit, with reference to dog pound loose items, have all been moved across fence to a secure area to prevent from being washed away.

Respectfully

Mike Spencer WWTP Supervisor



ARKANSAS  
Department of Environmental Quality

July 25, 2016

Mike Spencer, Wastewater Supervisor  
City of Mena  
323 Polk 53  
Mena, AR 71953

**Re: Response to Inspections (Polk Co)**  
**AFIN: 57-00423** **NPDES Permit No.: AR0036392**  
**ARR150000**

Dear Mr. Spencer:

I have reviewed your response pertaining to my April 6, 2016 inspections of your wastewater treatment facility and the Small Construction Site associated with the geotube staging area. However, the information provided does not sufficiently addresses the violations referenced in my inspection reports.

#### **AR0036692**

Please review the copies of the flow records included with this letter. The plant discharged the third week (Oct 19-23) of Oct 2015. The plant may have been offline during normal sample collection, which is conducted on Mondays - Wednesdays; however, if a discharge occurs from the permitted outfall, samples are to be collected per Part I, Section A of the permit and regardless of sample regime. Additionally, to demonstrate that bypass is not violating permit parameters, the bypass is to be sampled. During the 2017 permit renewal, the old outfall structure associated with the plant must be included with the flow diagram for the facility. Otherwise, discharges from this structure will be considered unpermitted discharges that do not meet criteria of the definition of "bypass" and will be subject to enforcement action.

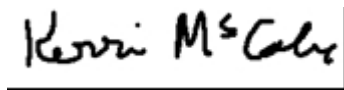
#### **ARR150000**

Your response references the City's No-Exposure permit (ARR000145). This is not the inspection that requires a response. The City modified the NPDES permit to construct a geotube staging area (AR0036392C). The disturbed area exceeded one acre (Condition #7), which requires the City to comply with the Construction General Permit (CGP; ARR150000). The City has not supplied a response for this inspection, which was provided with the Failure to Respond letter sent to the City on July 21, 2016.

Please provide the ADEQ Water Division Inspection Branch a response to these findings. Please provide the response no later than **August 8, 2016**.

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,

A handwritten signature in black ink, reading "Kerri McCabe", enclosed within a thin black rectangular border.

Kerri McCabe  
Inspector Supervisor  
Water Division

## McCabe, Kerri

---

**From:** Mike Spencer <menawwtp@gmail.com>  
**Sent:** Thursday, July 28, 2016 12:52 PM  
**To:** Water-Inspection-Report  
**Cc:** McCabe, Kerri  
**Subject:** ar0039992  
**Attachments:** IMG\_20160728\_0002.pdf

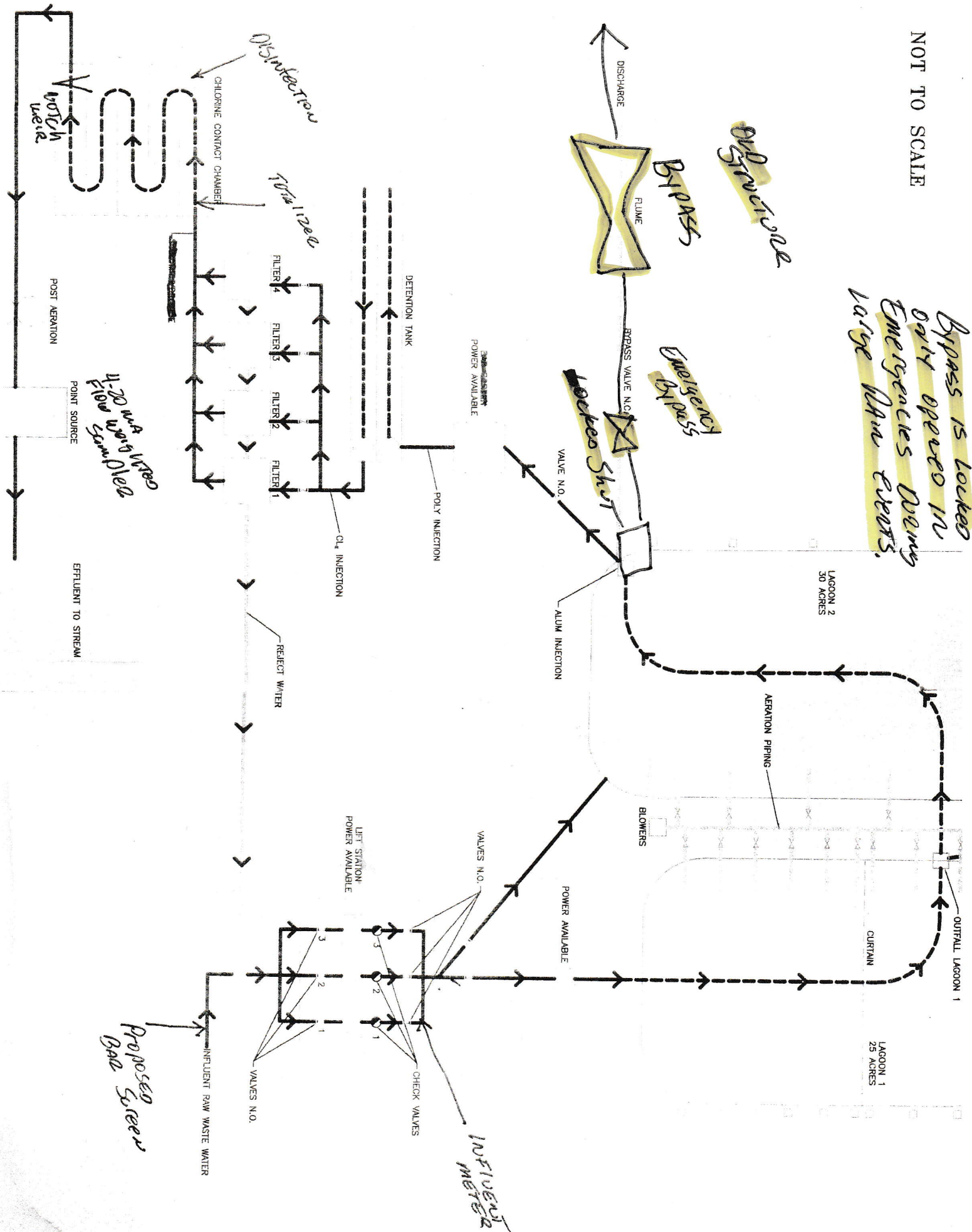
Kerri, I am not sure on the discrepancies' with the 2017 inspection comments. It was on the diagram submitted with permit renewal, but anyway the attached drawing shows old existing structure prior to 1986 filter installation. The inlet valve to the flume is locked shut and only opened when severe rain event to bypass plant and prevent levee breach. Our I and I is so severe that it has been open during these events in past.

Upon further investigation on October 2015, it appears inspector is correct and lab was not conducted on the two days required that week. I reviewed calendar for last year and I(Supervisor) was on vacation that week and its is obvious lead operator did not conduct lab as part of his duties. Even so some days we did not discharge , I returned and reviewed lab bench sheets and lab was not done and I failed to review effluent log and just assumed was shut down the entire week and lab would not be required. This is only time lab/sampling has not been conducted in the 14 years I have been Supervisor and will not happen again.

NOT TO SCALE

*Disinfectant*

*Bypass is locked  
only opened in  
emergencies during  
large drain events.*





## McCabe, Kerri

---

**From:** Mike Spencer <menawwtp@gmail.com>  
**Sent:** Thursday, July 28, 2016 1:11 PM  
**To:** Reiber, Loretta  
**Cc:** McCabe, Kerri  
**Subject:** FW: ar0039992

Loretta, If you will read Kerri's email we have in the past had to utilized our bypass in the event of a levee breach and bypass out of the old partial flume. We as you know are rated at 3.1 MGD and in rain events our flow is up at 4.5 MGD and usually stays that high 3 to 4 days after the rain stops. We maintain low freeboard to accept the hydraulic overload and try to keep water in lagoons, but it gets too high to contain we must bypass. Our formula has us at 600% percent I and I. We have reported bypasses in past but some were reported electronically and on SSO page and ADEQ may/or may not have seen them. I have been instructed to report these via normal channels and follow up with letter. As Kerri has stated this might need addressed in new permit.

---

**From:** McCabe, Kerri [<mailto:MCCABE@adeq.state.ar.us>]  
**Sent:** Thursday, July 28, 2016 12:58 PM  
**To:** Mike Spencer  
**Subject:** RE: ar0039992

Mike,

I saw your flow diagram during a review of the renewal permit. Be sure that Shane puts some comment that allows to use this structure during severe weather; it will be a permission to bypass. It will probably need to have "optional" reported with it. Without that documentation, these releases to protect levee integrity are unpermitted. ADEQ has made cities remove structures of this type, but I see the value in them (particularly lagoon systems). I just want to make sure the City of Mena is covered in their permit.

### 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:** Mike Spencer [<mailto:menawwtp@gmail.com>]  
**Sent:** Thursday, July 28, 2016 12:52 PM  
**To:** Water-Inspection-Report

**Cc:** McCabe, Kerri  
**Subject:** ar0039992

Kerri, I am not sure on the discrepancies' with the 2017 inspection comments. It was on the diagram submitted with permit renewal, but anyway the attached drawing shows old existing structure prior to 1986 filter installation. The inlet valve to the flume is locked shut and only opened when severe rain event to bypass plant and prevent levee breach. Our I and I is so severe that it has been open during these events in past.

Upon further investigation on October 2015, it appears inspector is correct and lab was not conducted on the two days required that week. I reviewed calendar for last year and I(Supervisor) was on vacation that week and its is obvious lead operator did not conduct lab as part of his duties. Even so some days we did not discharge , I returned and reviewed lab bench sheets and lab was not done and I failed to review effluent log and just assumed was shut down the entire week and lab would not be required. This is only time lab/sampling has not been conducted in the 14 years I have been Supervisor and will not happen again.



October 13, 2016

Mike Spencer, Wastewater Supervisor  
City of Mena  
323 Polk 53  
Mena, AR 71953

**Re: Response to Inspections – City of Mena (Polk Co)**  
**AFIN: 57-00423** **NPDES Permit No.: AR0036392**  
**ARR150000**

Dear Mr. Spencer:

I have reviewed the response pertaining to my April 6, 2016 inspections of your wastewater treatment facility and the Small Construction Site associated with the geotube staging area. The information provided sufficiently addresses the violations referenced in my inspection report. **Please be advised that any future construction work at the plant that disturbs over one acre of soil requires the Construction General Permit (CGP; ARR150000). The contractor for the City addressed concerns associated with the AR0036392C permit, which authorizes modification to the treatment system only. The Small Construction site inspection violations were never addressed; however, the site was in final stabilization during the time of the inspection.** 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,

A handwritten signature in black ink that reads "Kerri McCabe". The signature is written in a cursive, slightly stylized font. It is positioned above a horizontal line that serves as a separator from the typed name below.

Kerri McCabe  
Inspector Supervisor  
Compliance Branch  
Office of Water Quality