

July 6, 2017

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

RE: City of Nashville WWTP Inspection

AFIN	N: 31-00036	Permit No.:	AR0021776
AFI	N: 31-00036	Permit No.:	AR0021776 PCI
AFI	N: 31-00036	Permit No.:	AR0021776 IU
AFI	N: 31-00036	Permit No.:	AR0021776 SSO
AFI	N: 31-00036	Permit No.:	ARR000453
AFI	N: 31-00276	Permit No.:	4796-WG-WR-2

Dear Mr. Dunaway:

On May 10 and May 11, 2017, I performed Compliance Inspections of the above referenced facilities 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 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 <u>Water-Inspection-Report@adeq.state.ar.us</u>. 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 July 20, 2017.

If I can be of any assistance, please contact me at <u>smithron@adeq.state.ar.us</u> or 870-777-7585.

Sincerely, Rog Sith

Red Smith District 7 Field Inspector Water Division

Inspection Report: City of Nashville WWTP, AFIN: 31-00036, Permit #: AR0021776

			WATER		ISP	ECTIO	N REPORT	
		AF		ERMIT #: <b>AR0021</b> 7			DATE: <b>5/10/2017</b>	
^	RKANSAS	СС	DUNTY: <b>31 Howa</b> i	rd	PDS #	ŧ: <b>097870</b>	MEDIA: WN	
Dep	R K A N S A S partment of Environmental Quality	GF	PS LAT: 33.91988	1 LONG: -93.8612	40 L	OCATION: E	Intrance	
	FACILITY INFORMAT	ION		INS	PECT	ION INFOR	MATION	
	y of Nashville WWTP			FACILITY TYPE: <b>1 - Municipal</b>	INSPECT	or iD#: 4 S - State		
	TION: 3 Hwy 27 South			FACILITY EVALUATION RATING: 3 - Satisfactory			ION TYPE: pliance Evaluation	
CITY:	-			DATE(S): ENTI	RY TIME:	EXIT TIME:		
INd	RESPONSIBLE OFFIC	111			:00	16:45	7/1/2014	
	: / TITLE			5/11/2017 09	:00	15:15	PERMIT EXPIRATION DATE: 6/30/2019	
La COMF	rry Dunaway / Public Works Dire	cto	r	FAYETTEVILLE	SHALI	F RELATED	· N	
	y of Nashville			FAYETTEVILLES				
	ng address: 6 North Main							
- /	state, zip: shville AR 71852			NAME/TITLE/PHONE/FAX/EMAIL/		c Works Dir	ector/870-557-1953 c.	
	E & EXT: / FAX:						r/870-200-5044 c.	
870 EMAI	0-845-4015 /			Ed Carlyle, Pretreatment Coordinator/ 870-557-3143 c. Greg Strawn / WW Superintendent / 870-845-7400				
l.d	unaway@nashar.org			Greg Strawn / W	w Su	perintender	1t / 870-845-7400	
CC	NTACTED DURING INSPECTION:	Ye						
	(S=Si	atisfac	AREA EVA torv. M=Marginal. U=Unsati	LUATIONS sfactory, N=Not Applicable/E	valuated			
S	PERMIT	S	FLOW MEASUR		Ν	STORMWA		
S	RECORDS/REPORTS	S	LABORATORY		S		SITE REVIEW	
U S	OPERATION & MAINTENANCE	S S			S	<ul><li>S SELF-MONITORING PROGRAM</li><li>S PRETREATMENT</li></ul>		
s S	SAMPLING OTHER: Effluent Limits	<b>S</b> SLUDGE HANDLING/DISPOSAL		3	<b>G</b> FRETREATMENT			
•			SUMMARY C	F FINDINGS				
	1.) Excessive algae and vegetat	ion	(water pennywo	rt) was noted grow	wing o	on the v-not	tch weirs of the	
	clarifier (pictures 4, 5, 6, 7, 8	, 9,	& 10). Refer to Pa	art III, Section B, (	Condi	tion 1 of the	e permit for further	
	details.					,		
	2.) There was excessive vegeta Refer to Part III, Section B, C		• • •			on basins (	pictures 11 & 12).	
	Refer to Part III, Section B, C	one			lans.			
			GENERAL C	COMMENTS				
	ring a review of the DMR's, it was ril of 2016.	no	ted that the facili	ty had not experie	enced	any NH3-N	violations since	
чμ		$\cap$	-10					
	Kal 1	h,	#L					
INS	SPECTOR'S SIGNATURE:	_	Red Smith				DATE: 6/26/2017	
	lan lan	n R	Hentrag					
SU	PERVISOR'S SIGNATURE:		Jas	on Bolenbaugh			DATE: 7/3/2017	

Inspection Report: City of Nashville WWTP, AFIN: 31-00036, Permit #: AR0021776

Inspection Report: City of Nashville WWTP, AFIN: 31-00036, Permit #:	AR0021776
SECTION A: PERMIT VERIFICATION	
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS	ØS OM OU ONA ONE
DETAILS:	
1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE:	
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES:	
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT:	
4. ALL DISCHARGES ARE PERMITTED:	
SECTION B: RECORDKEEPING AND REPORTING EVALUATION	
RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT	
DETAILS:	
1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS:	
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE:	Øs 🗆m 🗇u 🗇na 🗇ne
a. DATES AND TIME(S) OF SAMPLING:	
b. EXACT LOCATION(S) OF SAMPLING:	
c. NAME OF INDIVIDUAL PERFORMING SAMPLING:	
d. ANALYTICAL METHODS AND TECHNIQUES:	Øy 🗆n 🗆na 🗆ne
e. RESULTS OF CALIBRATIONS:	Øy 🛛 n 🗆 na 🗆 ne
f. RESULTS OF ANALYSES:	
g. DATES AND TIMES OF ANALYSES:	
h. NAME OF PERSON(S) PERFORMING ANALYSES:	
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE:	
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR:	
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA:	Øy 🗆n 🗆na 🗆ne
SECTION C: OPERATIONS AND MAINTENANCE	
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED	
DETAILS:	
1. TREATMENT UNITS PROPERLY OPERATED:	Øs 🗆m 🗇u 🗇na 🗇ne
2. TREATMENT UNITS PROPERLY MAINTAINED:	
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED:	
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE:	
5. ALL NEEDED TREATMENT UNITS IN SERVICE:	
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED:	
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED:	Øs 🗆m 🗇u 🗇na 🗇ne
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE:	
9. STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED:	
10. PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED:	
11. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR:	
12. IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED:	
13. HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS:	
14. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT:	
15. IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT:	
14. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT:	DY DN DNA DNE DY ØN DNA DNE DY DN ØNA DNE

SECTION D: SAMPLING	10021110
PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS	
DETAILS:	
1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT:	
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES:	
Elocations adecoate for representative samples.     FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT:	
SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT:	
5. SAMPLING AND ANALISES COMPLETED ON FARAVETERS SPECIFIED IN PERMIT:	
6. SAMPLE COLLECTION PROCEDURES ADEQUATE:     a. SAMPLES REFRIGERATED DURING COMPOSITING:	
b. PROPER PRESERVATION TECHNIQUES USED:	
C. CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136:	
7. IF MONITORING IS PERFORMED MORE OFTEN THAN REQUIRED ARE RESULTS REPORTED ON THE DMR:	DY DN ØNA DNE
SECTION E: FLOW MEASUREMENT	
PERMITTEE FLOW MEASUREMENT PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS	
DETAILS:	
PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: TYPE OF DEVICE: 18" Parshall F	
<ol> <li>FLOW MEASURED AT EACH OUTFALL AS REQUIRED:</li> </ol>	
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED:	
4. CALIBRATION FREQUENCY ADEQUATE:	
5. RECORDS MAINTAINED OF CALIBRATION PROCEDURES:	
6. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE:	
8. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES:	
9. HEAD MEASURED AT PROPER LOCATION:	
SECTION F: LABORATORY	
PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS	
DETAILS:	
1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(B) FOR SLUDGES) :	
2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED:	
3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT:	
4. QUALITY CONTROL PROCEDURES ADEQUATE:	
5. DUPLICATE SAMPLES ARE ANALYZED ≥10% OF THE TIME:	
6. SPIKED SAMPLES ARE ANALYZED $\geq$ 10% OF THE TIME:	
7. COMMERCIAL LABORATORY USED:	
a. LAB NAME: <u>Ana-Lab</u>	
b. LAB ADDRESS: PO Box 9000 Kilgore, TX 75663	
c. PARAMETERS PERFORMED: <u>NH3-N, NO3+NO2-N, Total P, Total Recoverable Cyanide, Total Recoverable Selenium</u>	
8. BIOMONITORING PROCEDURES ADEQUATE: American Interplex Corp., 8600 Kanis Road, Little Rock, AQR 72204	
a. PROPER ORGANISMS USED:	
b. PROPER DILUTION SERIES FOLLOWED:	
c. PROPER TEST METHODS AND DURATION:	
d. RETESTS AND/OR TRE PERFORMED AS REQUIRED:	

SECTION G	EFFLUENT/R	ECEIVING WAT	ERS OBSERVA	TIONS				
BASED ON VISUAL OBSERVATIONS ONLY						ØS 🗆 M 🗆		
DETAILS:								
OUTFALL #:	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	COLOR	OTHER	
001	none	none	none	none	none	Green N/A		
SECTION H	I: SLUDGE DIS	POSAL						
SLUDGE D	DISPOSAL MEI	ETS PERMIT F	REQUIREMEN	ГS		ØS 🗆 M 🗆	IU DNA DNE	
DETAILS:					<u>.</u>			
1. SLUDGE M	IANAGEMENT ADEQU	ATE TO MAINTAIN EF	FLUENT QUALITY:			⊠s ⊡m		
2. SLUDGE R	ECORDS MAINTAINE	D AS REQUIRED BY 40	) CFR 503:			⊠s ⊡m		
3. FOR LAND	APPLIED SLUDGE, T	YPE OF LAND APPLIE	D TO: (E.G., FOREST,	AGRICULTURAL, PUE	BLIC CONTACT SITE):			
SECTION I:	SAMPLING IN	SPECTION PRO	CEDURES					
	RESULTS WITH	HIN PERMIT R	EQUIREMENT	S			IU ⊠NA ⊡NE	
DETAILS:								
	OBTAINED THIS INSP					ΠY	🗆 n 🗹 na 🗆 ne	
2. TYPE OF S	AMPLE: GRAB:		METHOD: FREQUE	NCY:				
3. SAMPLES	PRESERVED:						⊡n Øna ⊡ne	
4. FLOW PRC	PORTIONED SAMPLE	S OBTAINED:						
5. SAMPLE O	BTAINED FROM FACI	LITY'S SAMPLING DE	/ICE:					
6. SAMPLE R	EPRESENTATIVE OF	VOLUME AND NATUR	E OF DISCHARGE:					
7. SAMPLE SI	PLIT WITH PERMITTE	E:						
8. CHAIN-OF-	CUSTODY PROCEDU	RES EMPLOYED:						
9. SAMPLES	COLLECTED IN ACCO	RDANCE WITH PERM	IT:			ΠY		
		ER POLLUTION			、			
		EMENT MEET	S PERMIT RE	QUIREMENTS	, ,		IU ⊠NA ⊡NE	
	Inspected under		<b>D</b> 4 <b>T</b> 5					
-			JE WATERS:					
	N PREVENTION TEAM		A.					
			):					
		AND PAST SPILLS AND						
-	RUCTURAL BMPS:	IARGES ARE AUTHOR						
-		20.					ON ØNA ONE	
	DN-STRUCTURAL BMF							
	ONS CONDUCTED AS							
TI. INSFLOTIC								

## Inspection Report: City of Nashville WWTP, AFIN: 31-00036, Permit #: AR0021776

## FLOW CALCULATION SHEET

Date: 5/1	Date: 5/10/2017 Time: 1258						
		<b>–</b>	0.0				
Head in Inc	hes: <b>10.8</b> "	Feet:	0.9				
	a of Drimon v Flour	1		· 102 D1			
	e of Primary Flow I	vieasuren	nent Device	18 Parsna	all Flume w/ staff gauge		
Name & Mo	odel of Secondary	Flow Mea	asurement L		eledyne Isco (totalizer)		
Data of loof	Calibration of Coa			Maratak	Chaolia		
Date of last	Calibration of Sec	ondary F	Iow Device:	IVIONTNIY	v Checks		
Peopred d	Flow at Date & Tim	o Listad /		40 GPM			
Recolded r					(Facility Flow Meter)		
Calculated	Flow at Date & Tin	o Listod		290			
	ted using flow charts in: 19				dbook-5 <sup>th</sup> Edition)		
				asurement nan			
	Recorded Value	- Calo	culated Valu				
% Error =		lated Val		X 100			
	Calca						
	2240	-	2290				
% Error =		2290		— X 100			
		2200					
	-50						
% Error =	2290	X 100					
	2230						
% Error =	0.022	X 100					
	0.022	77 100					
% Error =	2.2	%					
		_ , ~ _					
Comments	Good shape						

## **DMR Calculation Check**

Reporting Period:	From	<u>2016</u> Year	2 Month	01 Day	_ To _	2016 Year	2 Month	29 Day
Parameter Checked:		TSS	-					
		Loading Mass					ntration	
	Mo.	Avg Ibs/d	lay	Mo. A	vg r	ng/l	7-day Avg	mg/l
Reported Value:		26			4		7	
Calculated Value:	26			4			7	
Permit Value:		438			15		22.5	5

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

	Water Division P	hotographic Evidence Sheet	
Location:	City of Nashville WWTP		
Photograp	oher: Red Smith	Date: 5/10/2017	Time: 1304
	Chip Colston / WW Manager		1
Descriptio	on: Thermometer inside automation		
			117
Photogram	oher: Red Smith		
Photograp Witness:	oher: Red Smith Chip Colston / WW Manager	Date: 5/10/2017	Time: <b>1304</b>
Witness:	oher:       Red Smith         Chip Colston / WW Manager         on:       Looking down DO ladder which	Date: <b>5/10/2017</b>	
Witness:	Chip Colston / WW Manager on: Looking down DO ladder whic	Date: <b>5/10/2017</b>	Time: 1304 2



	raphic Evidence Sheet
Location: City of Nashville WWTP	
Photographer: Red Smith	Date: 5/10/2017 Time: 1318
Witness: Chip Colston / WW Manager	5
Description: Water pennywort growing in v-notc	h weir inside clarifier.
Photographer: Red Smith	Date: 5/10/2017 Time: 1318
Witness: Chip Colston / WW Manager	
Description: Water pennywort growing behind s	

Water Division	Photographic Evidence Sheet	
Location: City of Nashville WWTP		
Photographer: Red Smith	Date: 5/10/2017	Time: 1318
Witness:Chip Colston / WW ManagerDescription:Excessive algae around we	•	7
		/2017
Photographer: Red Smith	Date: 5/10/2017	Time: 1319
Witness:       Chip Colston / WW Manager         Description:       More water pennywort.		



	Water Division	Photographic Evidence Sheet	
Location: Ci	ity of Nashville WWTP		
Photographer		Date: 5/10/2017	Time: 1335
	ip Colston / WW Manager		11
Description:	Looking from clarifiers towa	ard aeration basin. Notice water pen n aeration basin is covered with wate	nywort in basin.
Photographer Witness: <b>Ch</b>	Red Smith ip Colston / WW Manager	05/1 Date: <b>5/10/2017</b>	0/2017 Time: 1335 Photo #: 12
Description:	Another view of basins.		I



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

Cell 870-557-1953 Office 870-845-4015 Fax 870-845-7409 e-mail: npw@nashar.org

July 11, 2017

## ADEO

Water Division Inspection Branch 5301 Northshore Dr North Little Rock, AR 72118-5317

RE: City of Nashville WWTP Inspection AFIN 31-00036 Permit #AR0021776 AFIN 31-00036 Permit #AR0021776PCI AFIN 31-00036 Permit #AR0021776IU AFIN 31-00036 Permit #AR0021776SSO AFIN 31-00036 Permit #ARR000453 AFIN 31-00276 Permit #4796-WG-WR-2

Dear Mr. Smith,

This letter is in response to your letter and inspection report dated July 6, 2017. The City of Nashville's response will be as follows:

Item 1 - Excessive algae and vegetation was noted growing on the V-notch weirs of the clarifier. This has been removed by manually cleaning shortly after your visit. This will be prevented in the future by removal of water pennywort in the aeriation lagoons upstream of the clarifiers. Also a stricter cleaning schedule for the two clarifiers has been implemented.

Item 2 – There was excessive vegetation (water pennywort growing in the aeration basins.) This issue has been a problem for the City in the past and continues to be. The pennywort was removed mechanically previously but was ineffective. With your help the City of Nashville obtained a permit from ADEQ to apply an aquatic herbicide (RODEO) to eradicate the water pennywort. We only spray small sections of the ponds at a time to prevent an upset in our treatment process. This being the case it will be an ongoing process. The areas of the pond that have been treated to date are responding well.

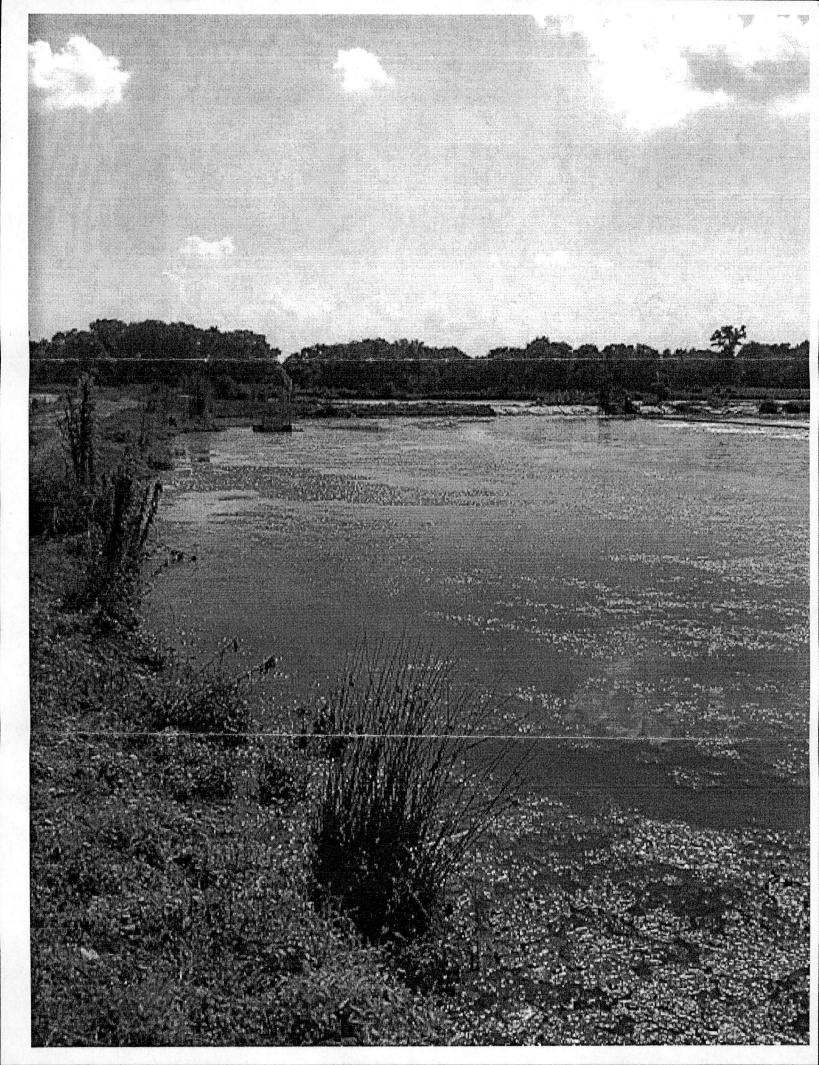
Thank you for your help, advice and encouragement during your visit. If you have any questions please contact me at the above numbers or email me.

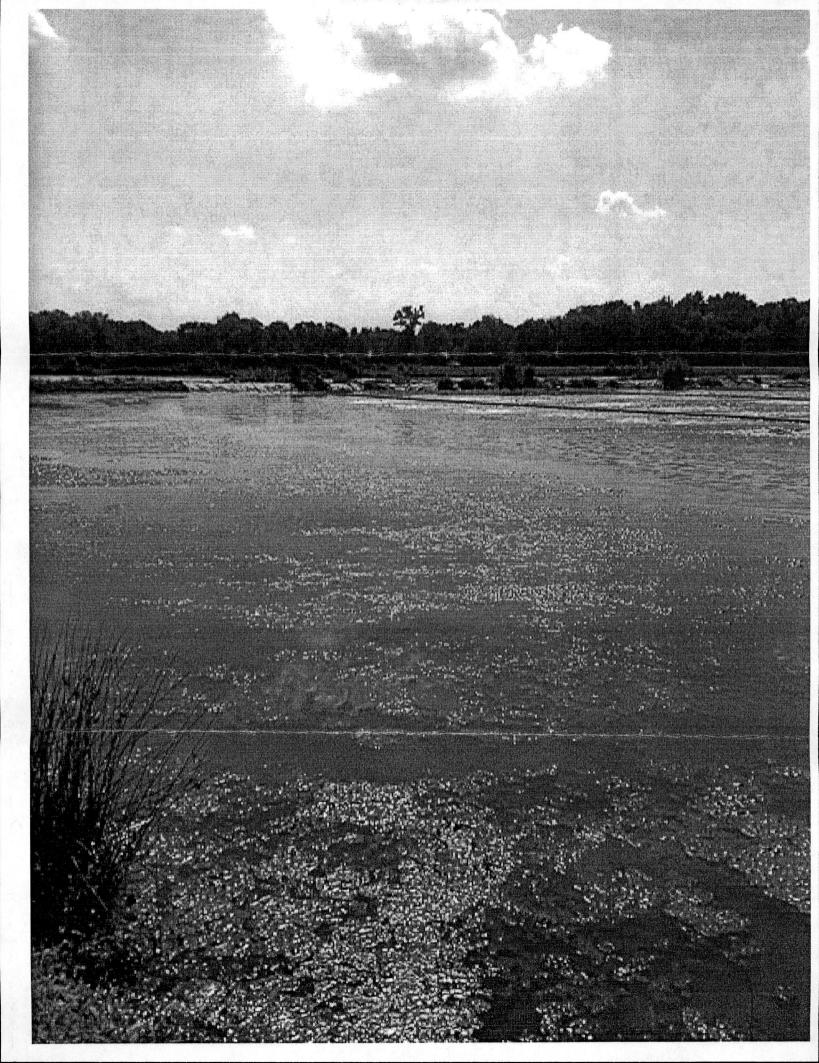
Sincerely,

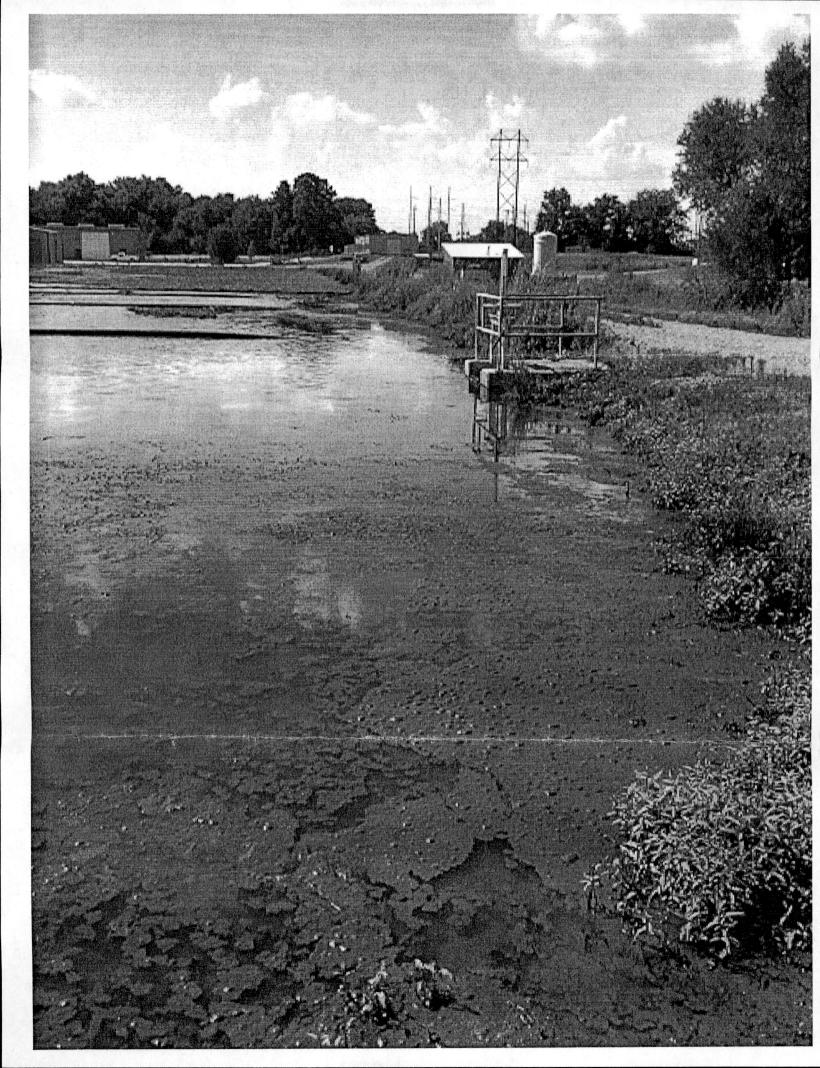
Junaway Larry Dunaway

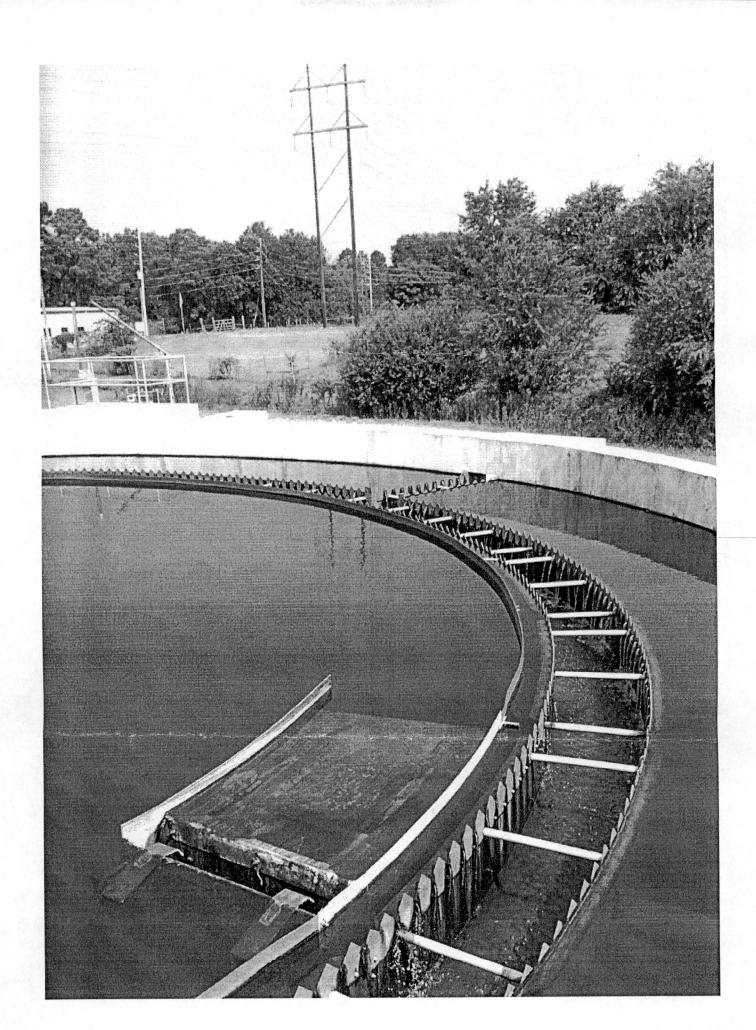
Public Works Director City of Nashville

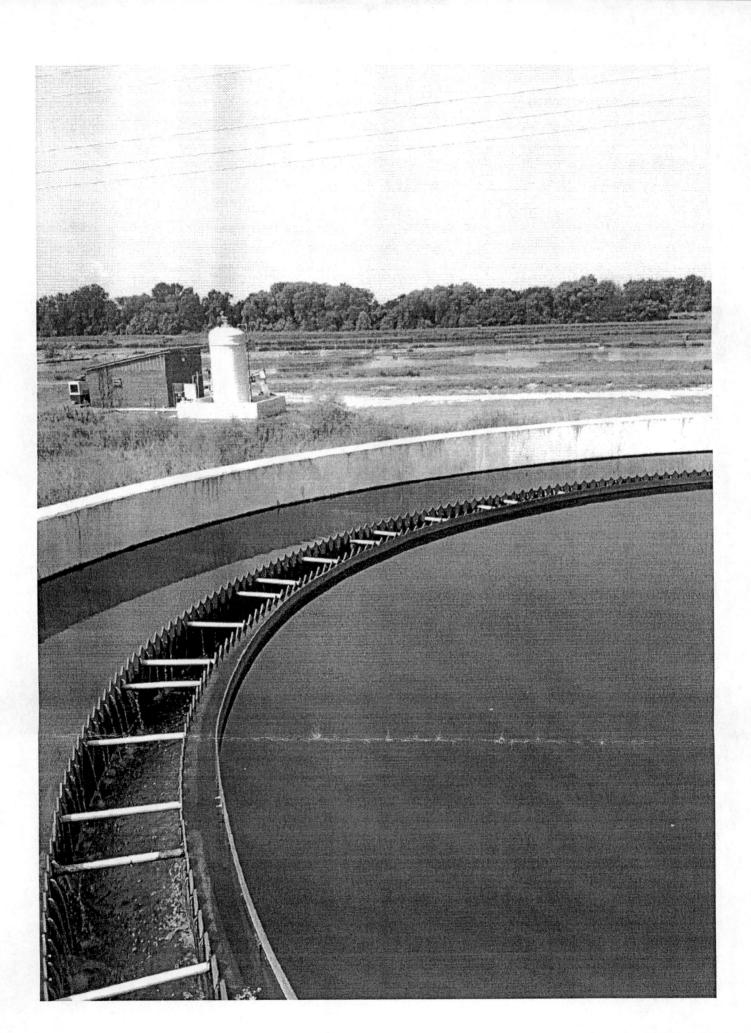
Enclosures

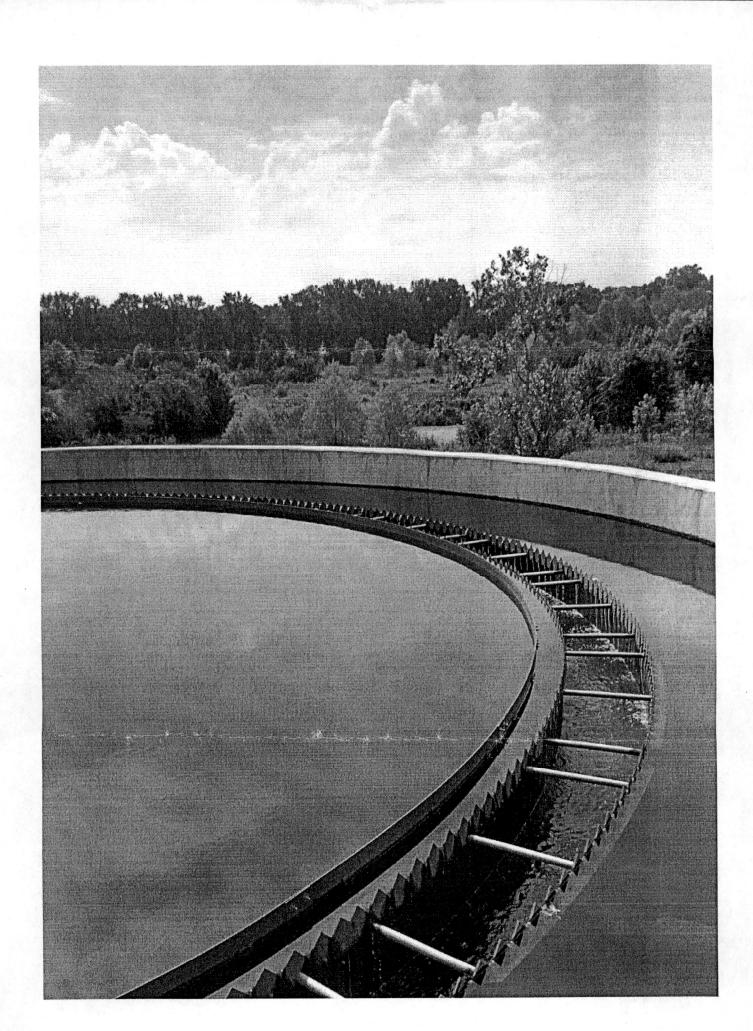


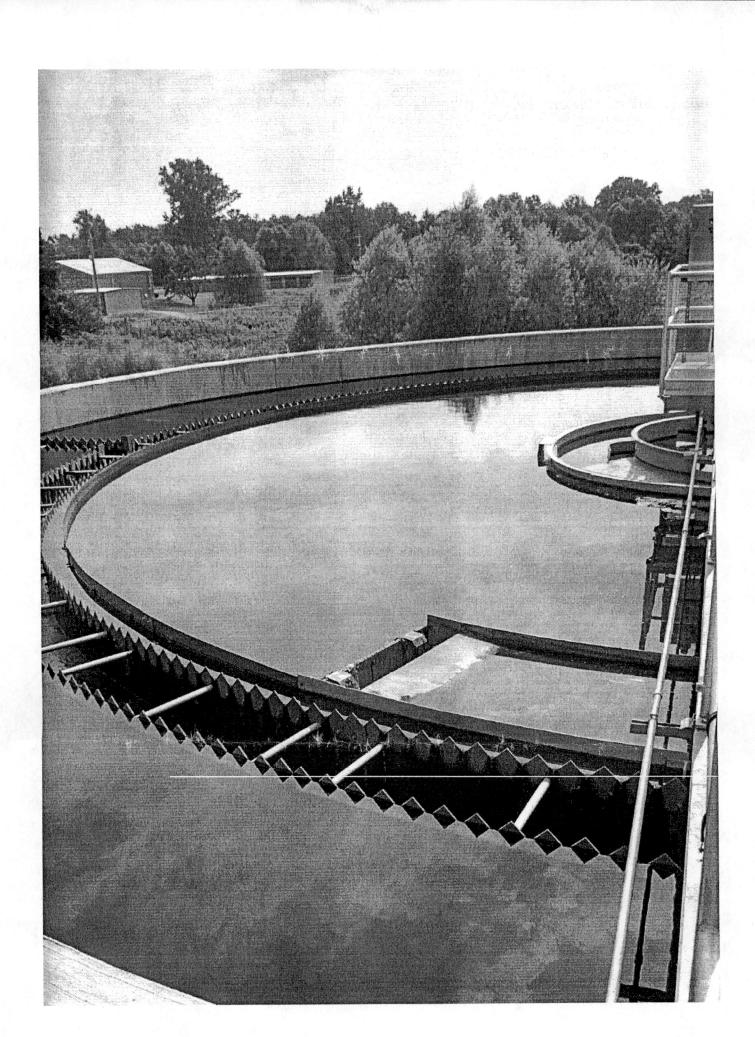












Nashville Public Works

426 North Main Street Nashville, AR 71852

Address Correction Requested

5.44 233

SHREVEPORT LA 710 17 JUL 117 PM 3 L **\$0.49** <u>0</u> US POSTAGE FIRST-CLASS 062S0009160086 71852



stamps.com stamps.com

stamps.comstanaps.com

\$0.490

US POSTAGE FIRST-CLASS

062S0009160086 71852

ADEQ

A. Sake

Water Division Inspection Branch 5301 Northshore Dr . North Little Rock, AR 72118-5317

72118-531799



July 28, 2017

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

City of Nashville WWTP Inspection Response

AFIN: 31-00036	Permit No.: AR0021776	
AFIN: 31-00036	Permit No.: AR0021776 PCI	
AFIN: 31-00036	Permit No.: AR0021776 IU	
AFIN: 31-00036	Permit No.: AR0021776 SSC	)
AFIN: 31-00036	Permit No.: ARR000453	
AFIN: 31-00276	Permit No.: 4796-WG-WR-2	

Dear Mr. Dunaway:

I have reviewed the response pertaining to my May 10 and May 11, 2017 inspection of the City of Nashville WWTP. The information provided sufficiently addresses the violations referenced in my inspection report. At this time the Department has no further comment concerning this particular inspection. Acceptance of this response by the Department does not preclude any future enforcement action deemed necessary at this site or any other site.

If we need further information concerning this matter, we will contact you. Thank you for your attention to this matter. Should you have any questions, feel free to contact me at 870-777-7585 or you may e-mail me at smithron@adeq.state.ar.us.

Sincerely,

Raf Soth

Red Smith District 7 Field Inspector Office of water Quality