

May 29, 2018

Honorable George McKee, Mayor City of Mena 323 Polk 53 Mena, AR 71953

RE: City of Mena WWTP Inspections (Polk Co) AFIN: 57-00423 NPDES Permit No.: AR0036692

Dear Mayor McKee:

On May 2, 2018, I performed a Compliance Evaluation Inspection and a SSO/Collection System 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 <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 <u>June 12, 2018</u>.

If I can be of any assistance, please contact me at <u>kremers@adeq.state.ar.us</u> or (479) 968-7339 ext. 17.

Sincerely,

Greg Kremers

Greg Kremers District 4 Field Inspector Office of Water Quality

			WATER	ATER DIVISION INSPECTION REPORT					
	AFIN: 57-00423 PI			ERMIT #: AR003	6692		DATE: 5/2/2018		
A	R K A N S A S	CC	UNTY: 57 Polk	PDS #: 103052				MEDIA: WN	
	partment of Environmental Quality	GP	S LAT: 34.55620	8 LONG: -94.188	8032 L	OCATION: E	ntrance	9	
	FACILITY INFORMAT	ION		IN	SPEC	TION INFOR	MATIO	N	
	er y of Mena WWTP			FACILITY TYPE: 1 - Municipal					
	3 Polk 53			FACILITY EVALUATION RATIN 2 - Marginal	G:			Evaluation	
-	na, AR			(-)	NTRY TIME: 9:45	EXIT TIME: 14:45	PERMIT EF	FECTIVE DATE:	
NAME	RESPONSIBLE OFFIC	CIAL	-				PERMIT EX	(PIRATION DATE:	
	norable George McKee / Mayor						8/31/2	2022	
COM	PANY:			FAYETTEVILLE SHALE RELATED: N					
	y of Mena			FAYETTEVILLE SHALE VIOLATIONS: N					
32	3 Polk 53			INSPECTION PARTICIPANTS					
	state, zip: na AR 71953			NAME/TITLE/PHONE/FAX/EMAIL/ETC.: Mike Spencer / Wastewater Supervisor / 479-234-2592					
	HIA AR 7 1933 IE & EXT: / FAX:			/ menawwtp@gmail.com					
47	9-394-4585 /			,					
EMAI									
	keemayor@sbcglobal.net NTACTED DURING INSPECTION:	No							
00		. 140	AREA EVA						
	(S=S	atisfac		ISFactory, N=Not Applicable	/Evaluated	1)			
S	PERMIT	S	FLOW MEASUF	REMENT	Ν	STORMWA			
S	RECORDS/REPORTS	U	LABORATORY		S	FACILITY S			
S	OPERATION & MAINTENANCE	S		CEIVING WATER				IG PROGRAM	
S	SAMPLING	S SLUDGE HANDLING/DISPOSAL			Ν	PRETREAT	MENT		
**	OTHER:								
			SUMMARY C	OF FINDINGS					
Du	The following violation was noted: Duplicate samples for pH, Dissolved Oxygen (DO), Fecal Coliform Bacteria (FCB), Total Residual Chlorine								
(TF	RC), and Total Suspended Solids	analyzed by the	facility	lab on at le	ast 10%	of the			

samples. This is a violation of Part III.C.3 of the permit.

GENERAL COMMENTS

The treatment system consists of bar screen, two-cell aerated lagoon system, continuous backwash rapid sand filters, chlorine disinfection, and post-aeration. The design flow is 3.1 MGD. The inspection consisted of a site assessment and review of records. A complaint was submitted by an adjacent landowner against the facility on April 19, 2018 stemming from a bypass of the treatment system (see separate complaint report).

The facility continues to experience substantial hydraulic overloading due to Inflow and Infiltration (I&I) stemming from issues within the collection system. Wastewater Supervisor Mike Spencer stated that over a five-day period in February 2018, approximately 30 million gallons of partially treated wastewater was bypassed from the system due to significant area rainfall. This bypass was reported to ADEQ. Mr. Spencer stated that after these rainfall periods, it takes fifteen days of no rain for I&I levels to return to normal. Permit limits for TSS were exceeded in February and March 2018 resulting from the higher I&I. Non-compliance reports (NCR) were submitted.

Site assessment

The system is well maintained. The diffusers in the lagoon were recently replaced. All treatments units were in operation and appeared to be functioning properly. Sludge is stored in geo-tubes and is to be land applied under State No-Discharge permit 5207-W. The landowner of the permitted application site has since decided that they no longer want the sludge applied to the property. Sludge is disposed of at the Ozark Ridge Landfill in Yell County. The in-house lab analyzes TSS, TRC, FCB, pH, and DO. However, duplicates are not being analyzed.

Records review

Chains of custody (COC), bench sheets, lab analyses, and Discharge Monitoring Reports (DMRs) for October 2017, December 2017, and February 2018 were reviewed. No discrepancies were noted.

Complaint investigation

I discussed with Mr. Spencer, the complaint that had been reported against the facility. He stated that the complaint was a result of a bypass that occurred at the plant on April 15, 2018. Mr. Spencer stated that he had spoken with the complainant and was aware of his concerns. ADEQ Enforcement Analyst, Bailey Taylor, verified that this bypass had been reported.

Grey Kremers	
INSPECTOR'S SIGNATURE: C Greg Kremers	DATE: 5/24/2018
Kerri MS Cale	
SUPERVISOR'S SIGNATURE:Kerri McCabe	DATE: 5/24/2018

SECTION A: PERMIT VERIFICATION	
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS	
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:	
e. RESULTS OF CALIBRATIONS:	
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:	
SECTION C: OPERATIONS AND MAINTENANCE	
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED	
DETAILS:	
1. TREATMENT UNITS PROPERLY OPERATED:	🗹 s 🗆 m 🗇 u 🗆 na 🗇 n
2. TREATMENT UNITS PROPERLY MAINTAINED:	
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED: <u>Generator</u>	Øs 🗆m 🗇u 🖾na 🗇n
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE:	
5. ALL NEEDED TREATMENT UNITS IN SERVICE:	
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED: Class III	
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED:	
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:	

SECTION D: SAMPLING	
PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS	ØS OM OU ONA ONE
DETAILS:	
1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT:	
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES:	
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT:	
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT:	
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT:	
6. SAMPLE COLLECTION PROCEDURES ADEQUATE:	Øy On Ona One
a. SAMPLES REFRIGERATED DURING COMPOSITING:	
b. PROPER PRESERVATION TECHNIQUES USED:	
c. CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136:	Øy 🛛 n 🖓 na 🖓 ne
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 MEETS PERMIT REQUIREMENTS	⊠S □M □U □NA □NE
DETAILS:	
1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: TYPE OF DEVICE: _90° V-notch weir	
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED:	Øy ⊡n ⊡na ⊡ne
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:	
7. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE:	
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	OS OM ØU ONA ONE
DETAILS:	
1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(B) FOR SLUDGES) :	DY DN DNA ØNE
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 <a>10% OF THE TIME:	
6. SPIKED SAMPLES ARE ANALYZED ≥10% OF THE TIME:	
7. COMMERCIAL LABORATORY USED:	Øy 🛛n 🖾na 🖾ne
a. LAB NAME: Data Testing	
b. LAB ADDRESS: 3434 Country Club Road, Fort Smith, AR 72903	
c. PARAMETERS PERFORMED: <u>NH3-N, CBOD5</u>	
8. BIOMONITORING PROCEDURES ADEQUATE:	
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/RECEIVING WATERS OBSERVATIONS									
BASED ON VISUAL OBSERVATIONS ONLY									
DETAILS: Based on observation at Outfall 001.									
OUTFALL #: OIL SHEEN GREASE TURBIDITY VISIBLE FOAM FLOATING SOLIDS COLOR									
001	None	None	None	None	Minimal	Clear			
					•				
SECTION H	I: SLUDGE DIS	POSAL							
SLUDGE D	DISPOSAL ME	ETS PERMIT F	REQUIREMEN	ГS		ØS 🗆 M 🗆			
DETAILS:	Sludge is taker	n to Ozark Ridge	e Landfill in Yel	I County.					
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 ⊡м	DU 🕅NA DNE		
3. FOR LAND	APPLIED SLUDGE, TY	PE OF LAND APPLIE	D TO: (E.G., FOREST,	AGRICULTURAL, PUE	BLIC CONTACT SITE):				
SECTION I:	SAMPLING IN	SPECTION PRO	CEDURES						
SAMPLE F	RESULTS WITH	HIN PERMIT R	EQUIREMENT	S			U ⊠NA ⊡NE		
DETAILS:									
1. SAMPLES	OBTAINED THIS INSPI	ECTION:				ΠY	⊡n Øna ⊡ne		
2. TYPE OF S	AMPLE: GRAB:		IETHOD: FREQUE	NCY:					
3. SAMPLES	PRESERVED:					ΠY	□n Øna □ne		
4. FLOW PRC	4. FLOW PROPORTIONED SAMPLES OBTAINED:								
5. SAMPLE O	BTAINED FROM FACIL	LITY'S SAMPLING DE	/ICE:			ΠY	On Øna One		
6. SAMPLE R	EPRESENTATIVE OF	VOLUME AND NATUR	E OF DISCHARGE:			ΠY	On Øna One		
7. SAMPLE S	PLIT WITH PERMITTEI	E:				ΠY	On Øna One		
8. CHAIN-OF-	CUSTODY PROCEDU	RES EMPLOYED:				ΠY	⊡n Øna ⊡ne		
9. SAMPLES	COLLECTED IN ACCO	RDANCE WITH PERM	IT:			ΠY	□n Øna □ne		
SECTION J	: STORM WAT	ER POLLUTION	PREVENTION	PLAN					
STORM W	ATER MANAG	EMENT MEET	S PERMIT RE	QUIREMENTS	5		U ⊡NA ØNE		
DETAILS:									
1. SWPPP UF	PDATED AS NEEDED:	DATE OF LAST UP	DATE:			ΠY	□n Øna □ne		
2. SITE MAP	INCLUDING ALL DISCH	HARGES AND SURFA	CE WATERS:			ΠY	On Øna One		
3. POLLUTIO	N PREVENTION TEAM	IDENTIFIED:				ΠY	⊡n Øna ⊡ne		
4. POLLUTIO	4. POLLUTION PREVENTION TEAM PROPERLY TRAINED:								
5. LIST OF PC	5. LIST OF POTENTIAL POLLUTANT SOURCES:								
6. LIST OF PC	DTENTIAL SOURCES A	AND PAST SPILLS ANI	D LEAKS:			ΩY	□n Øna □ne		
7. ALL NON-S	STORM WATER DISCH	ARGES ARE AUTHOR	IZED:			ΩY	□n Øna □ne		
8. LIST OF ST	RUCTURAL BMPS:					Ωy	□n Øna □ne		
9. LIST OF NO	ON-STRUCTURAL BMF	PS:				Ωy	□n Øna □ne		
10. BMPS PRC	PERLY OPERATED A	ND MAINTAINED:				ΠY	□n Øna □ne		
11. INSPECTIC	ONS CONDUCTED AS	REQUIRED:				ΠY	□n Øna □ne		

FLOW CALCULATION SHEET

		T LOW O	ALOOLATIO			
Date: 5	/2/2018	Time: 11	25			
Head in I	nches:	Feet:	1.06			
			nant Daviaa	00% \/ mot	ah wair	
Type & S	ize of Primary Flo	ow measurer	nent Device:	90° v-note	ch weir	
Name & I	Model of Second	ary Flow Mea	asurement D	evice: Mil	Itronics HydroRanger	
		•		-	· · · · · · · · · · · · · · · · · · ·	
Date of la	st Calibration of	Secondary F	low Device:	3/26/2018	8	
Recorded	Flow at Date &	Time Listed	Above: 133	33 GPM	(Facility Flow Meter)	
110001000						
	d Flow at Date &					
(Flow is calcu	ulated using flow charts	in: ISCO Open C	hannel Flow Mea	surement Handb	book-5 th Edition)	
	Recorded Va	lue - Cal	culated Valu	e		
% Error =		alculated Val		X 100		
% Error =	1333	-	1298	— X 100		
70 LIIUI -	•	1298		X 100		
	25					
% Error =	35	— X 100				
	1290					
% Error =	0.026	X 100				
% Error =	: 3	%				
Comments: Within ± 10% error.						
Johnen		<u>/0 GITUL</u>				

DMR Calculation Check

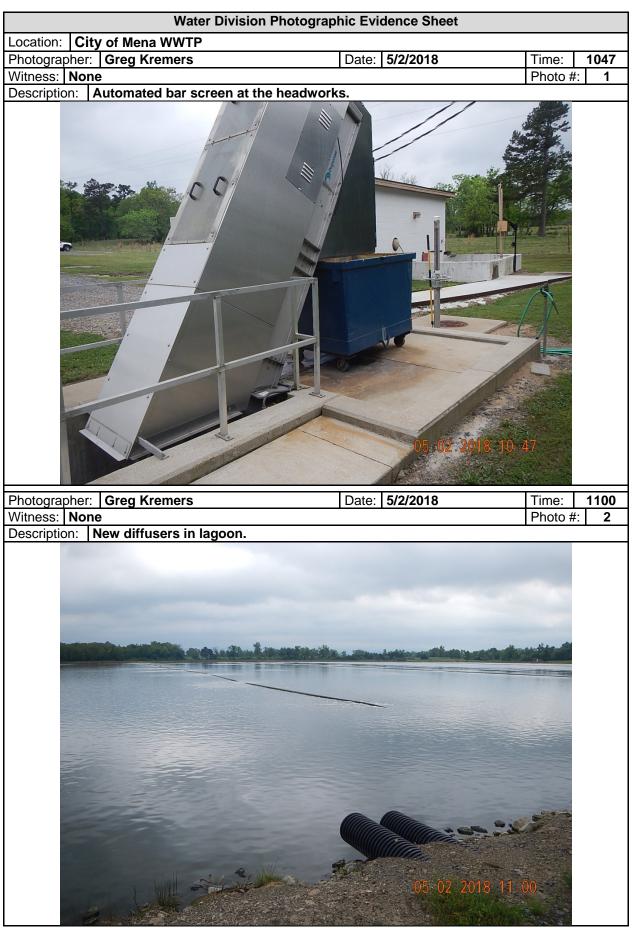
Reporting Period:	From	<u>2017</u> Year	<u> 10 </u> Month	01 Day	_ To	2017 Year	<u> </u>	<u>31</u> Day
Parameter Checked:		CBOD5	-					
		Loading Mass				Concer Mon		
	Mo.	Avg Ibs/c	lay	Mo. A	\vg I	ng/l	7-day Avg	ı mg/l
Reported Value:		20			6		12.	5
Calculated Value:	20.6			5.9			12.	5
Permit Value: 259					10		15	

If calculated value does not equal reported value, explain: Loading values vary slightly due to differences in rounding.

DMR Calculation Check

Reporting Period:	From	<u>2017</u> Year	<u> 10 </u> Month	01 Day	_ To _	2017 Year	<u> </u>	<u>31</u> Day
Parameter Checked:		TSS	-					
		Loading Mass				Concer Mon		
	Mo.	Avg Ibs/d	lay	Mo. A	vg r	ng/l	7-day Avg	ı mg/l
Reported Value:		31			7.8		11.9	5
Calculated Value:	30.2			7.8			11.	5
Permit Value: 388				15		22.5	5	

If calculated value does not equal reported value, explain: Loading values vary slightly due to differences in rounding.



Inspection Report Page 10 of 15



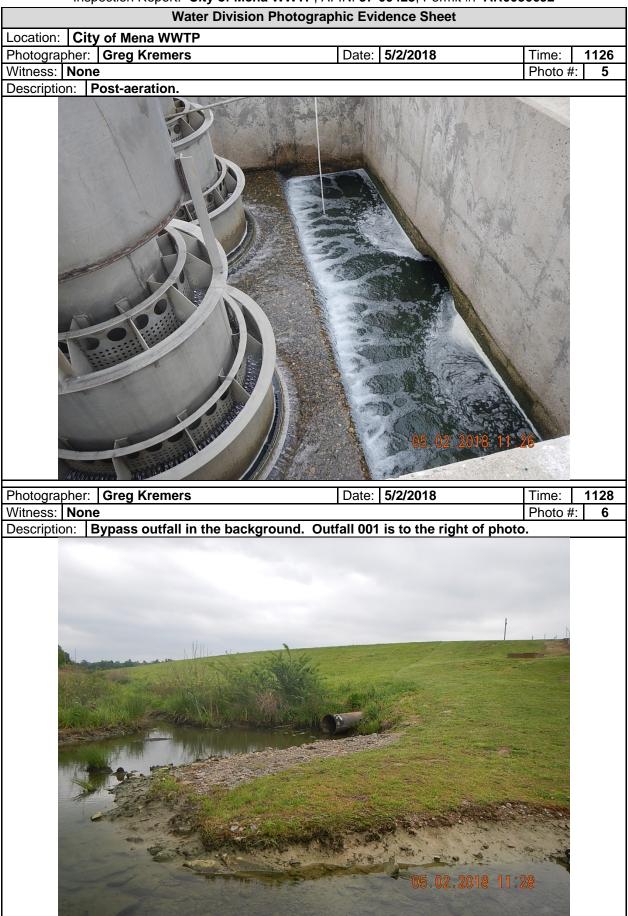






Figure 1. Google Earth image dated November 6, 2014 showing treatment components of the City of Mena WWTP.



From:	Charles Pitman
To:	Water-Inspection-Report
Cc:	Kremers, Greg; McCabe, Kerri; "George Mckee"; Larry Gross; "Wastewater"
Subject:	AR0036692_inspV_20180502
Date:	Thursday, June 07, 2018 2:12:28 PM
Attachments:	ADEQ insp response dist 6.2018.pdf

The response to the City of Mena's collection system inspection is attached.

Thank you, Charles Pitman General Manager Mena Water Utilities <u>Charles.menawater@sbcglobal.net</u> P-479.394.2761 F-479.394.5053



Dear Ms. McCabe,

In response to AR0036692 inspV 20180502 Collection System Inspection, three deficiencies were noted:

1. For the Mid-South lift station: An active overflow from the manhole associated with this lift station was observed entering a nearby creek at the time of the inspection. Mena Water Utilities cleaned up the overflow and submitted an overflow report to ADEQ. Additionally, the controls were inspected and repaired by an electrician.

701 MENA STREET ~MENA, ARKANSAS ~71953

PH (479) 394-2761 ~ FAX (479) 394-5053

ITIES

- 2. For the Mid-South lift station: Audible and visual alarms were not functioning to indicate high-water levels during the overflow event. Mena Water Utilities has had an electrician inspect and repair the audible and visual alarms.
- 3. For the Ouachita Circle lift station: The visual alarm did not operate during the test *function.* Mena Water Utilities has repaired the visual alarm by replacing the bulb.

Sincerely,

Larry Gross Collection System Supervisor

From:Kremers, GregTo:McConnell, MelissaSubject:FW: Water Division Inspection BranchDate:Wednesday, June 13, 2018 9:12:48 AMAttachments:IMG_20180529_0001.pdf

Melissa, Please include under WID 24267, thanks.

Greg Kremers District 4 Inspector Office of Water Quality (479) 968-7339

From: Wastewater [mailto:menawwtp@gmail.com]
Sent: Tuesday, May 29, 2018 11:50 AM
To: Water-Inspection-Report
Cc: Kremers, Greg
Subject: Water Division Inspection Branch

Wastewater

To: Cc: Subject: Water-Inspection-Report@adeq.state.ar.us kremers@adeq.state.ar.us Water Division Inspection Branch

With reference to 2 may 2018 semi annual inspection of the City Of Mena, WWTP the summary of findings are duplicates are not being done. As per week of 1-4 May 2018 duplicates with be completed as per Part III.C.3 of the permit.

Sincerely, Mike Spencer WWTP Supervisor

29 MAY 18



July 30, 2018

Honorable George McKee City of Mena 323 Polk 53 Mena, AR 71953

RE: City of Mena WWTP - Response to Inspections (Polk Co) AFIN: 57-00423 NPDES Permit No.: AR0036692

Dear Mayor McKee:

I have reviewed the response pertaining to my May 2, 2018 inspections of the Mena WWTP and collection system. The information provided sufficiently addresses the violations referenced in my inspection reports. At this time, the Department has no further comment concerning these particular inspections. 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) 968-7339 ext. 17 or you may e-mail me at <u>kremers@adeq.state.ar.us</u>.

Sincerely,

Greg Kremers District 4 Field Inspector Office of Water Quality