

December 16, 2019

Jim Smith, Water and Sewer Superintendent City of Cave City P.O. Box 69 Cave City, AR 72521

RE: City of Cave City WWTP Inspection (Sharp Co)

AFIN: 68-00015 NPDES Permit No.: AR0022110

Dear Mr. Smith:

On November 6, 2019, 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 e-mailed to Water-Inspection-Report@adeq.state.ar.us. This response should contain documentation describing the course of action taken to correct each item noted. This corrective action should be completed as soon as possible, and the written response with all necessary documentation (i.e., photos) is due by December 30, 2019.

If you need any assistance, please contact Kerri McCabe, Inspector Supervisor, at mccabe@adeq.state.ar.us or (501) 682-0642.

Sincerely,

Skyler Schlick

District 2 Field Inspector

Skyler Schlick

Water Division

VDEO	WATE	R DIVISION	DIVISION INSPECTION REPORT				
ADLQ	AFIN: 68-00015 PERMIT #: AR002211		22110		DATE: 11/6/2019		
ARKANSAS	COUNTY: 68 SI	harp	PDS i	#: 110384	MEDIA: WN		
Department of Environmental Quality	GPS LAT: 35.93	37270 LONG: -91.53	6058 L	OCATION: (General Area		
FACILITY INFORMAT	ION		NSPEC [*]	TION INFOR	RMATION		
NAME: City of Cave City WWTP LOCATION:		FACILITY TYPE: 1 - Municipal		208 S - State			
200 Foley Drive		facility evaluation rat 2 - Marginal	ING:		rion TYPE: npliance Evaluation		
CITY: Cave City		DATE(S):	ENTRY TIME:	EXIT TIME:	PERMIT EFFECTIVE DATE:		
RESPONSIBLE OFFIC	CIAL	11/6/2019	10:30	12:30	3/1/2019 PERMIT EXPIRATION DATE:		
NAME: / TITLE					2/29/2024		
COMPANY:	Jim Smith / Water and Sewer Superintendent			FAYETTEVILLE SHALE RELATED: N			
City of Cave City		FAYETTEVILL	FAYETTEVILLE SHALE VIOLATIONS: N				
P.O. Box 69			INSPECTION PARTICIPANTS				
CITY, STATE, ZIP:			NAME/TITLE/PHONE/FAX/EMAIL/ETC.: Jim Smith (Lic# 002527) /W&S Superintendent/ 870-				
Cave City AR 72521			283-5563/ water@cavecity.us				
870-283-5563 /		200 00007 1744	J. (G. J. L.)	contyluc			
EMAIL:							
water@cavecity.us CONTACTED DURING INSPECTION:	Yes						
		EVALUATIONS					
		Unsatisfactory, N=Not Applicab			A T.E.D.		
S PERMIT		SUREMENT	M				
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** OTHER:							

SUMMARY OF FINDINGS

The following violations were noted during the inspection:

- 1.) The following are violations of Part III, Section B, 1.A of the permit:
 - Vegetation growing in the clarifier, oxidation ditch, and sand drying beds.
 - Large accumulation of sludge/algae in the slack water of the oxidation ditch.
 - Trash and floatables around the dumpsters.
- 2.) There was some residual sludge on the ground that was pumped out and the trash can was leaking residual wastewater by the clarifier. This is a violation of Part II, Condition 5 of the permit.

GENERAL COMMENTS

On November 6, 2019, an inspection was conducted with the above-mentioned inspection participants. The inspection consisted of a records review and a site assessment.

Records review:

Records were reviewed from January, April, June, and October of 2018. All records were in order and well-maintained.

Site assessment:

Treatment consists of bar screen (one mechanical and one manual removal), oxidation ditch, clarifier boat, facultative lagoon, intermittent sand filter, post-aeration, and discharge to Outfall 001. There is no chlorine used in the chlorine contact chamber. The sand filters are alternated regularly and tilled prior to alternating. There were some areas where the wastewater pooled on the sand filter and the sand is not level. The discharge water from the outfall was very clear. There were some floatables observed in the oxidation ditch mainly clumped behind one of the rotors. The flow in the oxidation ditch seemed to vary depending on the location. Some areas had slack water with very little flow. Improving the uniform distribution of flow may improve the treatment process in the oxidation ditch. Every day the floatables are skimmed out of the clarifier. Once a month during the summer, the algae are cleaned out of the chlorine contact chamber. There is an aerobic digester that is used; however, wasting of activated sludge rarely occurs. Some sludge has built up in the facultative lagoon. If the sludge is ever removed from the lagoon, it must be disposed of in an approved manner.

INSPECTOR'S SIGNATURE: Skyler Schlick	DATE: 11/20/2019
Kerri Mª Cole	DATE 40/40/0040
SUPERVISOR'S SIGNATURE:Kerri McCabe	DATE: 12/13/2019

SECTION A: PERMIT VERIFICATION	
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS	☑S □M □U □NA □NE
DETAILS:	
1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE:	☑y □n □na □ne
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES:	□Y □N ☑NA □NE
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT:	☑Y □N □NA □NE
4. ALL DISCHARGES ARE PERMITTED:	☑y □n □na □ne
SECTION B: RECORDKEEPING AND REPORTING EVALUATION	
RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT	☑S □M □U □NA □NE
DETAILS:	
ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS:	☑Y □N □NA □NE
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE:	⊠S □M □U □NA □NE
a. DATES AND TIME(S) OF SAMPLING:	☑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 Om Ou Ona One
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA:	☑Y □N □NA □NE
SECTION C: OPERATIONS AND MAINTENANCE	
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED	□S ☑M □U □NA □NE
DETAILS: Housekeeping and general maintenance items.	
TREATMENT UNITS PROPERLY OPERATED:	□s ☑m □u □na □ne
TREATMENT UNITS PROPERLY MAINTAINED:	□S ØM □U □NA □NE
STANDBY POWER OR OTHER EQUIVALENT PROVIDED:	☑S ☐M ☐U ☐NA ☐NE
ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE:	Øs □m □u □na □ne
ALL NEEDED TREATMENT UNITS IN SERVICE:	☑S ☐M ☐U ☐NA ☐NE
ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED: Class III and Class I	☑S ☐M ☐U ☐NA ☐NE
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED:	☑S ☐M ☐U ☐NA ☐NE
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10. PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED: <u>Have bypass at equalization pond.</u> 11. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR: Once d	MY □N □NA □NE
inch rain event	MY UN UNA UNE
12. IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED:	✓Y □N □NA □NE
13. HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS:	□y □n ☑na □ne
14. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT:	MY □N □NA □NE
15. IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT:	□y ☑n □na □ne

SECTION D: SAMPLING MEETS PERMIT REQUIREMENTS			
DETTAILS: CONTract lab analyzes all parameters.			
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SECTION G	: EFFLUENT/R	RECEIVING WAT	TERS OBSERVA	ATIONS				
BASED ON	VISUAL OBS	ERVATIONS C	ONLY			⊠S □M □	U □NA □NE	
DETAILS:	Observed at O	utfall 001.						
OUTFALL #:	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	COLOR	OTHER	
001	NO	NO	NO	NO	NO	CLEAR		
SECTION H	: SLUDGE DIS	POSAL						
SLUDGE D	DISPOSAL MEI	ETS PERMIT F	REQUIREMENT	ΓS		ØS □M □	U □NA □NE	
DETAILS:	No sludge disp	osal.			<u> </u>			
1. SLUDGE M								
2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503:							□U ☑NA □NE	
3. FOR LAND	3. FOR LAND APPLIED SLUDGE, TYPE OF LAND APPLIED TO: (E.G., FOREST, AGRICULTURAL, PUBLIC 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 INSPECTION:								
2. TYPE OF S	SAMPLE: GRAB:_	□COMPOSITE:_ N	METHOD: FREQUE	NCY:				
3. SAMPLES	PRESERVED:					□Y	□n ☑na □ne	
4. FLOW PRO	PORTIONED SAMPLE	S OBTAINED:				□Y	□n ☑na □ne	
5. SAMPLE O	BTAINED FROM FACI	LITY'S SAMPLING DE\	/ICE:			□Y	□n ☑na □ne	
6. SAMPLE R	EPRESENTATIVE OF	VOLUME AND NATUR	E OF DISCHARGE:			□Y	□n ☑na □ne	
7. SAMPLE S	PLIT WITH PERMITTE	E:				□Y	□n ☑na □ne	
8. CHAIN-OF-	CUSTODY PROCEDU	RES EMPLOYED:				□Y	□N ☑NA □NE	
9. SAMPLES	COLLECTED IN ACCO	RDANCE WITH PERM	IT:			□Y	□N ☑NA □NE	
SECTION J	: STORM WAT	ER POLLUTION	PREVENTION	PLAN				
STORM W	ATER MANAG	EMENT MEET	S PERMIT RE	QUIREMENTS		□S ØM □	U □NA □NE	
DETAILS:_	Part II, Condition	on 5 requires B	MPs for stormw	ater protection	<u> </u>			
1. SWPPP UP	PDATED AS NEEDED:	DATE OF LAST UP	DATE:			□Y	□N ☑NA □NE	
2. SITE MAP I	INCLUDING ALL DISC	HARGES AND SURFA	CE WATERS:			□Y	□N ☑NA □NE	
3. POLLUTIO	N PREVENTION TEAM	I IDENTIFIED:				□Y	□N ☑NA □NE	
4. POLLUTIO	N PREVENTION TEAM	PROPERLY TRAINED) :			□Y	□n ☑na □ne	
5. LIST OF PO	OTENTIAL POLLUTAN	T SOURCES:				□Y	□N ☑NA □NE	
6. LIST OF PO	OTENTIAL SOURCES A	AND PAST SPILLS ANI	D LEAKS:			□Y	□n Øna □ne	
7. ALL NON-S	STORM WATER DISCH	IARGES ARE AUTHOR	RIZED:				□n Øna □ne	
8. LIST OF ST	RUCTURAL BMPS:					□Y	□n ⊠na □ne	
9. LIST OF NO	ON-STRUCTURAL BMF	PS:				□Y	□n Øna □ne	
10. BMPS PRO	PERLY OPERATED A	ND MAINTAINED:				□Y	□n Øna □ne	
11. INSPECTIO	ONS CONDUCTED AS	REQUIRED:				□Y	□n Øna □ne	

DMR Calculation Check

Reporting Period:	From	2018	<u> </u>	01	_ 10 _	2018	<u> </u>	30	
		Year	Month	Day		Year	Month	Day	
Parameter Checked:		TSS							
		Loading				Concer	ntration		

	Loading	Concentration			
	Mass	Mo	onthly		
	Mo. Avg Ibs/day	Mo. Avg mg/l	7-day Avg mg/l		
Reported Value:	2.8	5.5	8.0		
Calculated Value:	2.8	5.5	8.0		
Permit Value:	56.0	15.0	22.5		

If calculated value does not equal reported value, explain:

(8.0 mg/l + 3.0 mg/l)/2 = 5.5 mg/l

For June 13: (0.063022 MGD x 8.0 mg/l x 8.34)=4.2 lbs.

For June 14: (0.055335 MGD x 3.0 mg/l x 8.34)=1.384 lbs.

5.584/2 = 2.79 lbs./day

Values are the SAME.

DMR Calculation Check

01

To

Mo. Avg. - mg/l

2018

01

7-day Avg. - mg/l

31

01

2018

Mo. Avg. - Ibs/day

From

5						
	Year	Month	Day	Year	Month	Day
Parameter Checked:	NH3-N	_				
	Loading			Concen	tration	
	Mass			Mon	thly	

 Reported Value:
 1.42
 2.8
 4.1

 Calculated Value:
 1.14
 2.85
 4.1

Permit Value: 37.5 10.0 10.3

If calculated value does not equal reported value, explain:

(4.1 mg/l + 1.6 mg/l)/2 = 2.85 mg/l

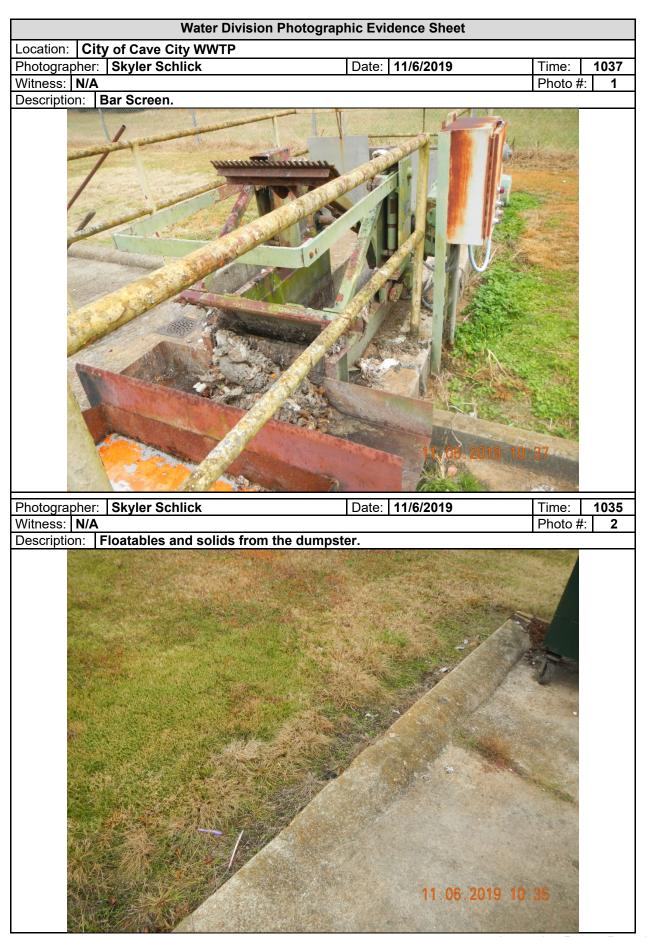
For January 10: (0.064192 MGD x 4.1 mg/l x 8.34)= 2.19 lbs.

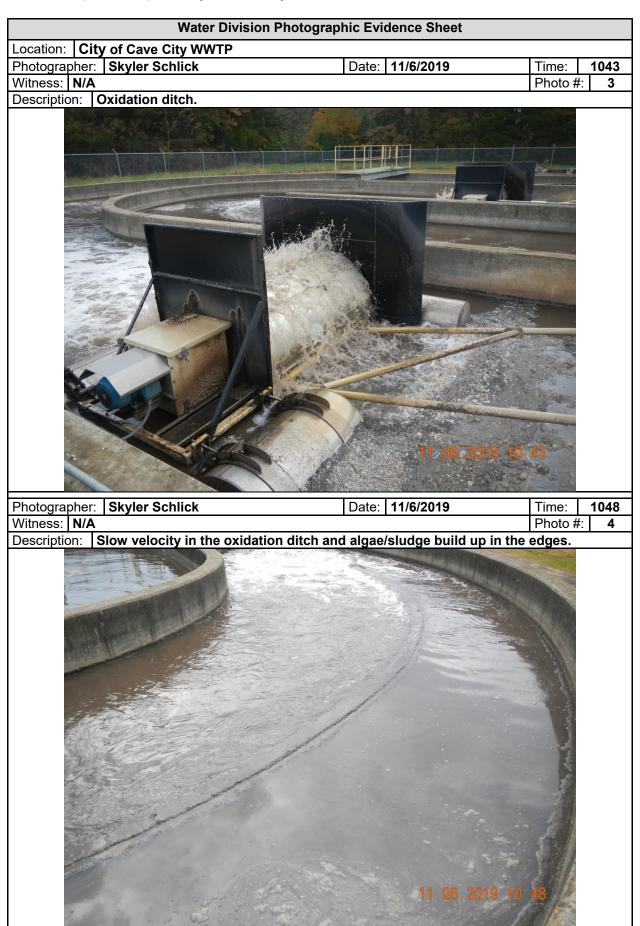
For January 24: (0.066710 MGD x 1.6 mg/l x 8.34)=0.89 lbs.

2.279/2 = 1.14 lbs./day

Reporting Period:

Values are the Similar.





Water Division Photographic Evidence Sheet Location: City of Cave City WWTP Photographer: Skyler Schlick Date: 11/6/2019 Time: 1049 Witness: N/A Photo #: Description: Varying velocities of wastewater. Photographer: Skyler Schlick Date: 11/6/2019 1106 Time: Witness: N/A Photo #: 6 Description: Clarifier. 11.06.2019 11:

Water Division Photographic Evidence Sheet Location: City of Cave City WWTP Photographer: Skyler Schlick Date: 11/6/2019 Time: 1051 Witness: N/A Photo #: 7

Description: Flow from clarifier to the facultative lagoon.



Photographer:	Skyler Schlick	Date:	11/6/2019	Time:	1052
Witness: N/A				Photo #	. 8

Description: Trash container leaking and sludge from pump on the ground.



Water Division Photographic Evidence Sheet Location: City of Cave City WWTP Photographer: Skyler Schlick Date: 11/6/2019 Time: 1137 Witness: N/A Photo #: 9

Description: Aerobic digester



Photographer:Skyler SchlickDate:11/6/2019Time:Witness:N/APhoto #:10

Description: Facultative lagoon.



Water Division Photographic Evidence Sheet Location: City of Cave City WWTP Photographer: Skyler Schlick Date: 11/6/2019 Time: 1114 Witness: N/A Photo #: 11



Photographer: Skyler Schlick	Date: 11/6/2019	Time:	1114
Witness: N/A		Photo #:	12

Description: Intermittent sand filters.



Water Division Photographic Evidence Sheet Location: City of Cave City WWTP Photographer: Skyler Schlick Date: 11/6/2019 Time: 1123 Witness: N/A Photo #: 13

Description: Intermittent sand filter.



Photographer:	Skyler Schlick	Date:	11/6/2019	Time:	1117
Witness: N/A				Photo #	14

Description: Chlorine contact chamber (no chlorine used).



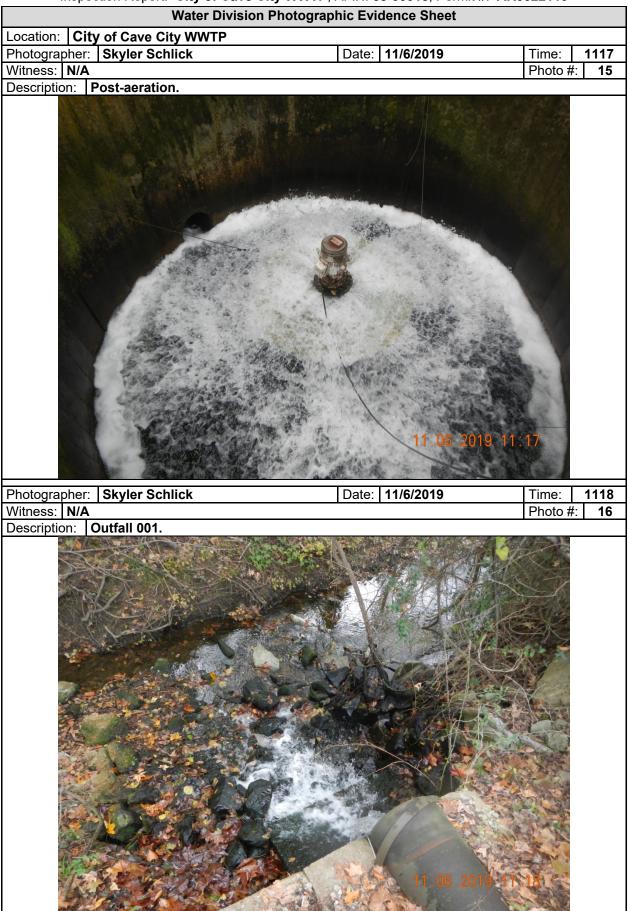


Figure 1. General overview of the site with major WWTP components labeled (Google Earth: imagery date March 4, 2016).



 From:
 Beck, Amy

 To:
 McConnell, Melissa

Subject: FW: RE: Cave City Water & Sewer: Pictures of corrective actions

Date: Wednesday, February 19, 2020 1:50:52 PM

Attachments: DOC021820-02182020221146.pdf

Please attach to PDS 110384.

-AB

From: Cave City Water Dept. [mailto:water@cavecity.us]

Sent: Wednesday, February 19, 2020 10:21 AM

To: Beck, Amy

Subject: FW: RE: Cave City Water & Sewer: Pictures of corrective actions

Skyler,

These are the pictures Jim took after taking the appropriate corrective actions.

Picture #1: Bar screen clean Picture #2: Vegetation gone Picture #3: Dumpster clean

Picture #4: 99% grease removed

Thanks,

Kim



Picture # 2



Picture #3









February 24, 2020

Jim Smith, Operator City of Cave City P.O. Box 69 Cave City, AR 72521

RE: City of Cave City WWTP - Response to Inspection (Sharp Co)

AFIN: 68-00015 NPDES Permit No.: AR0022110

Dear Mr. Smith:

I have reviewed the response pertaining to the November 6, 2019 inspection of the City of Cave City's WWTP. The information provided sufficiently addresses the violations referenced in the 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) 968-7339 ext. 16 or you may e-mail me at beck@adeq.state.ar.us.

Sincerely,

Amy Beck

District 5 Field Inspector Office of Water Quality