ADEQ

A R K A N S A S
Department of Environmental Quality

March 16, 2020

Kevin Hatfield, Mayor
City of Huntsville
P.O. Box 430
Huntsville, AR 72740

RE: Huntsville WWTF Compliance Evaluation Inspection
AFIN: 44-00018 Permit No.: AR0022004

Honorable Mayor Hatfield:

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 Office of Water Quality Compliance 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 **March 31, 2020**.

If I can be of any assistance, please contact me at grimesg@adeq.state.ar.us or 479-267-0811 extension 16.

Sincerely,

Garrett Grimes
District 1 Field Inspector
Office of Water Quality

ADEQ
ARKANSAS
Department of Environmental Quality

OFFICE OF WATER QUALITY INSPECTION REPORT

AFIN: **44-00018**	PERMIT #: **AR0022004**	DATE: **11/6/2019**
COUNTY: **44 Madison**	PDS #: **111392**	MEDIA: **WN**
GPS LAT: **36.11238** LONG: **-93.732969** LOCATION: **Outfall**		

FACILITY INFORMATION

NAME:
Huntsville WWTF
LOCATION:
30187 Madison Hwy 23
CITY:
Huntsville

RESPONSIBLE OFFICIAL

NAME: / TITLE
Kevin Hatfield / Mayor
COMPANY:
City of Huntsville
MAILING ADDRESS:
P.O. Box 430
CITY, STATE, ZIP:
Huntsville AR 72740
PHONE & EXT: / FAX:
479-738-6929 /
EMAIL:

CONTACTED DURING INSPECTION: **No**

INSPECTION INFORMATION

FACILITY TYPE:	INSPECTOR ID#:
1 - Municipal	**104111 S - State**

FACILITY EVALUATION RATING:	INSPECTION TYPE:
3 - Satisfactory	**Compliance Evaluation**

DATE(S):	ENTRY TIME:	EXIT TIME:	PERMIT EFFECTIVE DATE:
11/6/2019	**10:50**	**13:49**	**6/1/2011**
			PERMIT EXPIRATION DATE:

FAYETTEVILLE SHALE RELATED: **N**

FAYETTEVILLE SHALE VIOLATIONS: **N**

INSPECTION PARTICIPANTS

NAME/TITLE/PHONE/FAX/EMAIL/ETC.:
Larry Garrett, Executive Director, Huntsville Water Utilities;
Sean Davis, Assistant Director, Huntsville Water Utilities;
Bill Eoff, Wastewater Manager, Huntsville Water Utilities;
Garrett Grimes, District 1 Inspector, ADEQ

AREA EVALUATIONS

(S=Satisfactory, M=Marginal, U=Unsatisfactory, N=Not Applicable/Evaluated)

M	PERMIT	**S**	FLOW MEASUREMENT	**N**	STORMWATER
S	RECORDS/REPORTS	**S**	LABORATORY	**S**	FACILITY SITE REVIEW
M	OPERATION & MAINTENANCE	**S**	EFFLUENT/RECEIVING WATER	**S**	SELF-MONITORING PROGRAM
S	SAMPLING	**S**	SLUDGE HANDLING/DISPOSAL	**S**	PRETREATMENT
N	OTHER:				

SUMMARY OF FINDINGS

The following violations were noted during the inspection:

1. **Effluent Limitations; Part I, Section A. of the permit**
   a. **Fourteen (14) excursions were reported on monthly Discharge Monitoring Reports (DMRs) from March 2018 to September 2019 (Attachment 1). Non-compliance Reports (NCRs) were submitted to the ADEQ Office of Water Quality Enforcement Branch when these occurred.**

2. **Operation and Maintenance; Part III, Section B.1.a. of the permit**
   a. **At the time of the inspection, tar insulation from the sludge dryer was observed deposited on the ground (Photo #1, Attachment 2). This was also noted in the March 21, 2018, CEI Report (Attachment 2). Huntsville Water Utilities explained that the tar dripping from the insulation does not affect the treatment of biosolids. However, it was also noted that the reason the tar insulation enters a liquid state is from the sludge dryer running at a higher temperature than originally intended. These higher temperatures were explained as necessary to produce Class A sludge while processing enough solids to meet the needs of the facility. Since temperatures utilized for drying sludge are past the intended design of the sludge dryer which is resulting in damage to the unit, the dryer is being improperly operated. Treatment units must be properly operated and maintained at all times.**

   b. **The City of Huntsville formerly used sludge drying beds to process solids. Currently, the drying beds are out-of-service and overgrown with vegetation (Photo #2). Mr. Garrett stated that the**

sludge was not removed from these beds when taken out-of-service. These beds must be maintained and vegetation removed to prevent damage.

GENERAL COMMENTS
• **The City of Huntsville uses GTS Inc. as a laboratory contractor for effluent and influent analyses of Carbonaceous Biochemical Oxygen Demand (CBOD5), Total Suspended Solids (TSS), Ammonia Nitrogen (NH3-N), Fecal Coliform Bacteria (FCB), Total Phosphorous, Nitrite+Nitrate Nitrogen, and Total Dissolved Solids (TDS). A recent audit of the contract laboratory revealed that NH3-N was not analyzed using methods approved under 40 CFR Part 136 and therefore the reported results are invalid. The ADEQ Office of Water Quality Enforcement Branch will notify the City of Huntsville regarding the submission of corrected DMRs and any additional corrective action that must be completed regarding this item.**

INSPECTOR'S SIGNATURE:  **Garrett Grimes**	DATE: **12/9/2019**
SUPERVISOR'S SIGNATURE:  **Brent L. Walker**	DATE: **3/13/2020**

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: **Effluent violations noted in DMRs.**	☐Y ☑N ☐NA ☐NE

SECTION B: RECORDKEEPING AND REPORTING EVALUATION

RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT	☑S ☐M ☐U ☐NA ☐NE
DETAILS:	
1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS:	☑Y ☐N ☐NA ☐NE
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE:	☑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:	☐S ☐M ☐U ☐NA ☑NE
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:	
1. TREATMENT UNITS PROPERLY OPERATED: **Sludge dryer**	☐S ☐M ☑U ☐NA ☐NE
2. TREATMENT UNITS PROPERLY MAINTAINED: **Drying beds**	☐S ☐M ☑U ☐NA ☐NE
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED:	☑S ☐M ☐U ☐NA ☐NE
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE: **SCADA**	☑S ☐M ☐U ☐NA ☐NE
5. ALL NEEDED TREATMENT UNITS IN SERVICE:	☑S ☐M ☐U ☐NA ☐NE
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED: **Bill – Class IV, Sean – Class IV, Larry – Class III**	☑S ☐M ☐U ☐NA ☐NE
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED:	☑S ☐M ☐U ☐NA ☐NE
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE:	☑Y ☐N ☐NA ☐NE
9. STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED:	☑Y ☐N ☐NA ☐NE
10. PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED:	☑Y ☐N ☐NA ☐NE
11. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR:	☑Y ☐N ☐NA ☐NE
12. IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED:	☑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: **I&I**	☑Y ☐N ☐NA ☐NE
15. IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT:	☐Y ☑N ☐NA ☐NE

SECTION D: SAMPLING	
PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS	☑S ☐M ☐U ☐NA ☐NE
DETAILS:	
1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT:	☑Y ☐N ☐NA ☐NE
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES:	☑Y ☐N ☐NA ☐NE
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT:	☑Y ☐N ☐NA ☐NE
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT:	☑Y ☐N ☐NA ☐NE
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT:	☑Y ☐N ☐NA ☐NE
6. SAMPLE COLLECTION PROCEDURES ADEQUATE:	☑Y ☐N ☐NA ☐NE
a. SAMPLES REFRIGERATED DURING COMPOSITING:	☑Y ☐N ☐NA ☐NE
b. PROPER PRESERVATION TECHNIQUES USED:	☑Y ☐N ☐NA ☐NE
c. CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136:	☑Y ☐N ☐NA ☐NE
7. IF MONITORING IS PERFORMED MORE OFTEN THAN REQUIRED ARE RESULTS REPORTED ON THE DMR:	☐Y ☐N ☑NA ☐NE

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: **2' H-Flume** TYPE OF DEVICE:	☑Y ☐N ☐NA ☐NE
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED:	☑Y ☐N ☐NA ☐NE
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED:	☑Y ☐N ☐NA ☐NE
4. CALIBRATION FREQUENCY ADEQUATE:	☑Y ☐N ☐NA ☐NE
5. RECORDS MAINTAINED OF CALIBRATION PROCEDURES:	☑Y ☐N ☐NA ☐NE
6. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE:	☑Y ☐N ☐NA ☐NE
7. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE:	☑Y ☐N ☐NA ☐NE
8. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES:	☑Y ☐N ☐NA ☐NE
9. HEAD MEASURED AT PROPER LOCATION:	☑Y ☐N ☐NA ☐NE

SECTION F: LABORATORY	
PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS	☑S ☐M ☐U ☐NA ☐NE
DETAILS:	
1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(B) FOR SLUDGES) : **See comments section.**	☐Y ☑N ☐NA ☐NE
2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED:	☑Y ☐N ☐NA ☐NE
3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT:	☑Y ☐N ☐NA ☐NE
4. QUALITY CONTROL PROCEDURES ADEQUATE:	☑Y ☐N ☐NA ☐NE
5. DUPLICATE SAMPLES ARE ANALYZED ≥10% OF THE TIME:	☑Y ☐N ☐NA ☐NE
6. SPIKED SAMPLES ARE ANALYZED ≥10% OF THE TIME:	☑Y ☐N ☐NA ☐NE
7. COMMERCIAL LABORATORY USED:	☑Y ☐N ☐NA ☐NE
a. LAB NAME: **GTS Inc. , American Interplex**	
b. LAB ADDRESS: **GTS Inc., 1915 N. Shiloh Dr., Fayetteville, AR 72704; American Interplex, 8600 Kanis Rd., Little Rock, AR 72204**	
c. PARAMETERS PERFORMED: **GTS Inc. (Monthly DMR excluding DO & pH), American Interplex (WET Testing)**	
8. BIOMONITORING PROCEDURES ADEQUATE:	☑Y ☐N ☐NA ☐NE
a. PROPER ORGANISMS USED:	☑Y ☐N ☐NA ☐NE
b. PROPER DILUTION SERIES FOLLOWED:	☑Y ☐N ☐NA ☐NE
c. PROPER TEST METHODS AND DURATION:	☑Y ☐N ☐NA ☐NE
d. RETESTS AND/OR TRE PERFORMED AS REQUIRED:	☐Y ☐N ☑NA ☐NE

SECTION G: EFFLUENT/RECEIVING WATERS OBSERVATIONS

BASED ON VISUAL OBSERVATIONS ONLY — ☑S ☐M ☐U ☐NA ☐NE

DETAILS:

OUTFALL #:	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	COLOR	OTHER
001	None	None	None	Trace	None	Clear	--

SECTION H: SLUDGE DISPOSAL

SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS — ☑S ☐M ☐U ☐NA ☐NE

DETAILS:

1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY: ☑S ☐M ☐U ☐NA ☐NE
2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503: ☑S ☐M ☐U ☐NA ☐NE
3. FOR LAND APPLIED SLUDGE, TYPE OF LAND APPLIED TO: (E.G., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE):

SECTION I: SAMPLING INSPECTION PROCEDURES

SAMPLE RESULTS WITHIN PERMIT REQUIREMENTS — ☐S ☐M ☐U ☑NA ☐NE

DETAILS:

1. SAMPLES OBTAINED THIS INSPECTION: ☐Y ☐N ☑NA ☐NE
2. TYPE OF SAMPLE: ☐GRAB:__ ☐COMPOSITE:__ METHOD:__ FREQUENCY:
3. SAMPLES PRESERVED: ☐Y ☐N ☑NA ☐NE
4. FLOW PROPORTIONED SAMPLES OBTAINED: ☐Y ☐N ☑NA ☐NE
5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE: ☐Y ☐N ☑NA ☐NE
6. SAMPLE REPRESENTATIVE OF VOLUME AND NATURE OF DISCHARGE: ☐Y ☐N ☑NA ☐NE
7. SAMPLE SPLIT WITH PERMITTEE: ☐Y ☐N ☑NA ☐NE
8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED: ☐Y ☐N ☑NA ☐NE
9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT: ☐Y ☐N ☑NA ☐NE

SECTION J: STORM WATER POLLUTION PREVENTION PLAN

STORM WATER MANAGEMENT MEETS PERMIT REQUIREMENTS — ☐S ☐M ☐U ☑NA ☐NE

DETAILS: **Refer to separate Industrial Stormwater No-Exposure Certification Inspection report**

1. SWPPP UPDATED AS NEEDED:__ DATE OF LAST UPDATE: ☐Y ☐N ☑NA ☐NE
2. SITE MAP INCLUDING ALL DISCHARGES AND SURFACE WATERS: ☐Y ☐N ☑NA ☐NE
3. POLLUTION PREVENTION TEAM IDENTIFIED: ☐Y ☐N ☑NA ☐NE
4. POLLUTION PREVENTION TEAM PROPERLY TRAINED: ☐Y ☐N ☑NA ☐NE
5. LIST OF POTENTIAL POLLUTANT SOURCES: ☐Y ☐N ☑NA ☐NE
6. LIST OF POTENTIAL SOURCES AND PAST SPILLS AND LEAKS: ☐Y ☐N ☑NA ☐NE
7. ALL NON-STORM WATER DISCHARGES ARE AUTHORIZED: ☐Y ☐N ☑NA ☐NE
8. LIST OF STRUCTURAL BMPS: ☐Y ☐N ☑NA ☐NE
9. LIST OF NON-STRUCTURAL BMPS: ☐Y ☐N ☑NA ☐NE
10. BMPS PROPERLY OPERATED AND MAINTAINED: ☐Y ☐N ☑NA ☐NE
11. INSPECTIONS CONDUCTED AS REQUIRED: ☐Y ☐N ☑NA ☐NE

FLOW CALCULATION SHEET

Date: **11/6/2019** Time: **11:49**

Head in Inches: **15** Feet: **1.25**

Type & Size of Primary Flow Measurement Device: 2' H Flume

Name & Model of Secondary Flow Measurement Device: Greyline SLT 5.0

Date of last Calibration of Secondary Flow Device: 11/13/2018

Recorded Flow at Date & Time Listed Above: **2.247** (Facility Flow Meter)

Calculated Flow at Date & Time Listed Above: **2.398**

(Flow is calculated using flow charts in: ISCO Open Channel Flow Measurement Handbook-5th Edition)

$$\% \text{ Error} = \frac{\text{Recorded Value} - \text{Calculated Value}}{\text{Calculated Value}} \times 100$$

$$\% \text{ Error} = \frac{2.247 - 2.398}{2.398} \times 100$$

$$\% \text{ Error} = \frac{-0.151}{2.398} \times 100$$

% Error = 0.063 X 100

% Error = **6.3** %

Comments:

DMR Calculation Check

Reporting Period:	**From**	**2018** (Year)	**11** (Month)	**1** (Day)	**To**	**2018** (Year)	**11** (Month)	**30** (Day)

Parameter Checked: **NO2+NO3 N**

	Loading	**Concentration**	
	Mass	**Monthly**	
	Mo. Avg. - lbs/day	**Mo. Avg. - mg/l**	**7-day Avg. - mg/l**
Reported Value:	**193.4**	**16.8**	**18.4**
Calculated Value:	**193.4**	**17**	**18**
Permit Value:	**166.8**	**10**	**15**

If calculated value does not equal reported value, explain:

Rounding.

DMR Calculation Check

Reporting Period: From

2019	9	01	To	2019	9	30
Year	Month	Day		Year	Month	Day

Parameter Checked: FCB

	Loading Mass Mo. Avg. - lbs/day	Concentration Monthly Mo. Avg. - mg/l	Concentration Monthly 7-day Avg. - mg/l
Reported Value:		36	1203
Calculated Value:		36	1203
Permit Value:		1000	2000

If calculated value does not equal reported value, explain:

Office of Water Quality Photographic Evidence Sheet					
Location:	**Huntsville WWTF**				
Photographer:	**Garrett Grimes, District 1 Inspector**	Date:	**11/06/2019**	Time:	**12:00**
Witness:				Photo #:	**1**
Description:	**Sludge dryer. Tar was observed dripping from the insulation due to heat.**				

Photographer:	**Garrett Grimes, District 1 Inspector**	Date:	**11/06/2019**	Time:	**13:49**
Witness:				Photo #:	**2**
Description:	**Out-of-service sludge drying beds overgrown with vegetation.**				

Attachment 1: Table of effluent excursions from the April 2018 to October 2019.

Monitoring Period Date	Parameter Description	Limit Type	DMR Value	DMR Value Unit	Limit Value	Limit Value Unit	% Exceedance
June 2018	Nitrite+Nitrate Nitrogen	MO AVG	10.1	mg/L	10	mg/L	1
October 2018	Nitrite+Nitrate Nitrogen	MO AVG	11	mg/L	10	mg/L	10
November 2018	Nitrite+Nitrate Nitrogen	MO AVG	16.8	mg/L	10	mg/L	68
November 2018	Nitrite+Nitrate Nitrogen	7 DA AVG	18.4	mg/L	15	mg/L	23
November 2018	Nitrite+Nitrate Nitrogen	MO AVG	193.0	lbs./d	166.8	lbs./d	16
December 2018	Nitrite+Nitrate Nitrogen	7 DA AVG	21.6	mg/L	15	mg/L	44
January 2019	Nitrite+Nitrate Nitrogen	MO AVG	10.8	mg/L	10	mg/L	8
February 2019	Nitrite+Nitrate Nitrogen	MO AVG	13.4	mg/L	10	mg/L	34
February 2019	Nitrite+Nitrate Nitrogen	7 DA AVG	16.4	mg/L	15	mg/L	9
February 2019	Nitrite+Nitrate Nitrogen	MO AVG	205.9	lbs./d	166.8	lbs./d	24
August 2019	Oxygen, dissolved (DO)	INST MIN	6.5	mg/L	6.6	mg/L	2
August 2019	Coliform, fecal general	7 DA GEO	2420	#/100mL	2000	#/100mL	21
September 2019	Nitrogen, ammonia total (as N)	MO AVG	2.3	mg/L	1.6	mg/L	44
September 2019	Nitrogen, ammonia total (as N)	7 DA AVG	9.1	mg/L	3.9	mg/L	133

Attachment 2: Photograph from March 21, 2018, CEI report showing tar dripping from the sludge dryer.

Office of Water Quality Photographic Evidence Sheet					
Location:	**Huntsville WWTF**				
Photographer:	**Garrett Grimes, District 1 Inspector**	Date:	**03/21/2018**	Time:	**10:15**
Witness:				Photo #:	**3**
Description:	**Sludge dryer with tar dripping from the insulation onto the floor of the building.**				

ADEQ

A R K A N S A S
Department of Environmental Quality

CERTIFIED MAIL: 9489 0090 0027 6060 6273 68

May 21, 2020

Kevin Hatfield, Mayor
City of Huntsville
P.O. Box 430
Huntsville, AR 72740

Re: Huntsville WWTF - Failure to Respond to Inspection
AFIN: 44-00018 Permit No.: AR0022004

Honorable Mayor Hatfield:

A letter dated March 16, 2020, was sent by ADEQ to the City of Huntsville. The letter outlined the findings of my November 6, 2019 inspection of the above-referenced facility. The letter requested that a written response be submitted to the Office of Water Quality Compliance Branch of this Department by March 31, 2020. To date, no response has been received.

Please submit a written response by **June 5, 2020**. A copy of the inspection report has been included for your convenience.

Thank you for your attention to this matter. Should you have any questions, feel free to contact me at (479) 267-0811 extension 16 or e-mail me at grimesg@adeq.state.ar.us.

Sincerely,

Garrett Grimes
District 1 Field Inspector
Office of Water Quality

From:	Sean Davis
To:	Water-Inspection-Report
Subject:	Huntsville Water Utilities Inspections
Date:	Thursday, May 21, 2020 1:45:48 PM
Attachments:	Response Letter ARR000005.pdf Response Letter AR0022004.pdf

---

To whom it may concern,

Attached are the responses to an inspection ADEQ made of the Huntsville Water WWTF on November 6, 2019. The responses are labeled with the permits that the inspections covered on that date; AR0022004 and ARR000005. If there is anything else we can do, please let me know.

Thank you,

Sean Davis
Huntsville Water Utilities
(479)738-6929

May 21, 2020

ADEQ
Office of Water Quality Compliance Branch
5301 Northshore Dr.
North Little Rock, AR 72118

RE: Huntsville WWTF Compliance Evaluation Inspection
AFIN: 44-00018 Permit No.: ARR0022004

To whom it may concern:

In response to the inspection conducted on November 6, 2019, Huntsville Water has taken the following action:

1. Violation: 14 excursions – Effluent Limitations

Corrective Action:

From June 2018 to February 2019, Nitrite + Nitrate limits were exceeded 10 times. This was a result of a dramatic shift in loading from an area industry. We have adjusted to this change in loading by installing mixers to allow us more control over D.O. levels in our oxidation ditch. Since this implementation on July 10, 2019, the WWTF has been able to successfully meet our permit limits in regards to Nitrite + Nitrate.

In August of 2019, D.O. limits were exceeded. D.O. levels, unfortunately, were fluctuating greatly during the first couple months after the mixers were implemented. We were adjusting to lower D.O. levels as a result of switching from paddle rotors to the mixers. After adjusting the air diffusers to accommodate the change, the WWTF has had no trouble meeting permit limits in this field.

In August of 2019, Fecal Coliform limits were exceeded. Due to the fact that testing both before and after this excursion showed much lower levels of Fecal Coliform, it is Huntsville Water's belief that contamination occurred either at our facility or the contract lab. We have taken steps to help ensure that contamination does not occur at the WWTF. No issues have been experienced since.

In September of 2019, ammonia limits were exceeded twice. Heavy loading from local industry nearly killed out bacteria at the WWTF, making it impossible to improve ammonia levels during this time. The issue was corrected by working with the local industry to improve the loading coming into the WWTF, as well as reseeding the WWTF with bacteria. No instances of non-compliance have occurred in this parameter since.

Planned date of completion: Completed

2. a. Violation: Tar deposits in the sludge dryer building.

Corrective Action: The insulation in question has been removed during repairs to the dryer system. It will be replaced with insulation better rated for the temperatures using an adhesive that will not melt or run off the machinery and onto the floor.

Planned date of completion: 3rd quarter, 2020.

2.b. Violation: Drying beds not properly maintained

Corrective Action: Due to the fact that the drying beds have not been used for their intended purpose in over 20 years, Huntsville Water is currently seeking approval from the permitting division of ADEQ to remove all but one of the cells, which has already been cleaned. The WWTF plans to utilize this cell to collect scum trough water.

Planned date of completion: 6 – 8 weeks (pending approval from ADEQ)

Should you need any more information or have any questions/concerns, please feel free to contact me at any time.

Thank you,

Sean Davis
Huntsville Water Utilities
(479) 738-6929
water@madisoncounty.net

ADEQ

A R K A N S A S
Department of Environmental Quality

July 22, 2020

Kevin Hatfield, Mayor
City of Huntsville
P.O. Box 430
Huntsville, AR 72740

RE: Huntsville WWTF Compliance Evaluation Inspection
AFIN: 44-00018 Permit No.: AR0022004

Honorable Mayor Hatfield:

I have reviewed your response pertaining to my November 6, 2019, inspection of the above referenced facility. However, the information provided does not sufficiently addresses the violations referenced in my inspection report. Please provide the following:

1. Your response states that insulation observed on sludge dryer has been removed and is in the process of being replaced with insulation rated for higher temperatures. Please submit notification when this is complete along with photographs and applicable documentation (invoices, etc.).

2. Your response states that the sludge drying beds are planned for removal except for a single cell which has been cleaned. Please send notification that this has occurred. Please submit photographs of the remediated cell.

The above items require your immediate attention. Please submit a written response to these items to the Office of Water Quality Compliance Branch of this Department. This response should be mailed to the address at the bottom of the first page of the letter or e-mailed to Water-Inspection-report@adeq.state.ar.us. **This response is due by September 30, 2020**.

Thank you for your attention to this matter. Should you have any questions, feel free to contact me at 479-267-0811, ext. 16 or you may e-mail me at grimesg@adeq.state.ar.us.

Sincerely,

Garrett Grimes
District 1 Field Inspector
Office of Water Quality

From:	Sean Davis
To:	Water-Inspection-Report
Cc:	Grimes, Garrett; Bill
Subject:	Response for Huntsville Water AR0022004
Date:	Wednesday, September 23, 2020 4:03:51 PM
Attachments:	ADEQ Response 2020.pdf

To whom it may concern,

Attached is the response to items brought up by Mr. Garrett Grimes during his inspection of our treatment plant on November 6, 2019. Please let me know if any additional information is required.

Thank you,

Sean Davis
Huntsville Water Utilities
(479)738-6929

PO Box 430

Huntsville, AR 72740

Mr. Garrett Grimes

5301 Northshore Drive

Little Rock, AR 72118

September 23, 2020

RE: Huntsville WWTF Compliance Evaluation Inspection

AFIN: 44-00018 Permit No.: AR0022004

Mr. Grimes,

This letter is in response to your concerns brought up during the inspection on November 6, 2019.

Item #1: Insulation on components of the dryer system dripping tar.

In March of this year, we experienced a fire within the dust collector, a component of the dryer building. As a result, we have had to disassemble most of the dryer system. In doing so, we removed all the insulation containing the tar, which is the item that you had expressed concerns about.

When the system is re-assembled and new insulation is installed, we will not be using the same insulation that was used originally. At this point, I do not have specific details as to what type of insulation will be installed but I will be more than happy to provide documentation on the insulation once it is ordered.

Item #2: Drying beds were not well maintained

Of the eight separate drying beds, one was cleaned and then split into two smaller cells, allowing us to alternate between the two for maintenance purposes. The other seven beds have been removed and dirt has been brought in to level the area. See photos below:

Remaining in use bed, divided and in operation

View from the south of drying beds after demolition. The remaining in use bed can be seen on the right.

View from the north after demolition.

Some final work is still underway to make the grounds easy to mow, after which we will be sowing grass seed.

If you have any questions or need additional information from us, please feel free to contact me at any time.

Thank you,

Sean Davis

Huntsville Water Utilities

(479) 738-6929

water@madisoncounty.net

ADEQ
ARKANSAS
Department of Environmental Quality

October 26, 2020

Kevin Hatfield, Mayor
City of Huntsville
P.O. Box 430
Huntsville, AR 72740

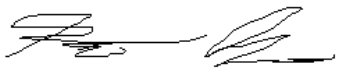
RE: Adequate Response to Inspection
AFIN: 44-00018 Permit No.: AR0022004

Honorable Mayor Hatfield:

The Department has received your September 23, 2020, response to the inspection conducted on November 6, 2020. Your response adequately addresses the request in the Summary of Findings section of the report. Acceptance of this response by the Department does not preclude any future enforcement action deemed necessary at this site or any other site.

If I need further information concerning this matter, I will contact you. Thank you for your attention to this matter. If I can be any assistance please feel free to contact me at grimesg@adeq.state.ar.us or 479.267.0811 ext. 16.

Sincerely,



Garrett Grimes
District 1 Field Inspector
Office of Water Quality