September 1, 2020

Honorable Jerald Marberry, Mayor
City of Flippin
P.O Box 40
Flippin, AR 72634

RE: City of Flippin POTW Inspection (Marion Co)
AFIN: 45-00021 NPDES Permit No.: AR0021717

Dear Mayor Marberry:

On August 18, 2020, 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 **September 16, 2020**.

If I can be of any assistance, please contact me at mccabe@adeq.state.ar.us or (501) 682-0642.

Sincerely,

Kerri McCabe

Kerri McCabe, Inspector Supervisor
Office of Water Quality – Compliance Branch
ADEE

CC: JL Wagoner, Public Works Director, City of Flippin, cofmaintenance@hotmail.com

Division of Environmental Quality
5301 Northshore Drive, North Little Rock, AR 72118-5137
adeq.state.ar.us

ARKANSAS ENERGY & ENVIRONMENT | ENVIRONMENTAL QUALITY

OFFICE OF WATER QUALITY INSPECTION REPORT

AFIN: **45-00021**	PERMIT #: **AR0021717**	DATE: **8/18/2020**
COUNTY: **45 Marion**	PDS #: **113170**	MEDIA: **WN**
GPS LAT: **36.282126** LONG: **-92.584351** LOCATION: **Entrance**		

FACILITY INFORMATION

NAME:
City of Flippin POTW
LOCATION:
222 East Industrial Drive
CITY:
Flippin, AR

RESPONSIBLE OFFICIAL

NAME: / TITLE
Honorable Jerald Marberry / Mayor
COMPANY:
City of Flippin
MAILING ADDRESS:
P.O Box 40
CITY, STATE, ZIP:
Flippin AR 72634
PHONE & EXT: / FAX:
870-453-5722 /
EMAIL:
cofmaintenance@hotmail.com
CONTACTED DURING INSPECTION: **Yes**

INSPECTION INFORMATION

FACILITY TYPE: **1 - Municipal**
INSPECTOR ID#: **84022 S - State**
FACILITY EVALUATION RATING: **2 - Marginal**
INSPECTION TYPE: **Compliance Evaluation**
DATE(S): **8/18/2020**
ENTRY TIME: **09:00**
EXIT TIME: **11:45**
PERMIT EFFECTIVE DATE: **11/1/2017**
PERMIT EXPIRATION DATE: **10/30/2022**
FAYETTEVILLE SHALE RELATED: **N**
FAYETTEVILLE SHALE VIOLATIONS: **N**

INSPECTION PARTICIPANTS

NAME/TITLE/PHONE/FAX/EMAIL/ETC.:
JL Wagoner, Public Works Director (Class III; Lic. #010535)
Scott Garrison, Operator (Class III; Lic. #008578)
Chance Sumpter, Operator (Class III; Lic. #012210)

AREA EVALUATIONS

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

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

SUMMARY OF FINDINGS

The following violations were noted at the time of inspection:

1.) **The city has reported numerous effluent exceedances during the April – Nov 2019 record review. This is a violation of Part I, Section A of the permit. These exceedances have been reported with monthly DMR and no further response is required for this item.**

2.) **The secondary flowmeter has not been calibrated by a qualified technician since Oct 2010. This is a violation of Part III, Section C, 2 of the permit. The flowmeter must be calibrated annually by a qualified technician.**

3.) **Effluent exceedances require 24-hour reporting per Part III, Section D, 6 of the permit. This reporting is in addition to reporting on monthly DMR. The city has not reported Non-compliance Reports (NCR) for the effluent exceedances for 2019. This is a violation of Part III, Section D, 6, A of the permit. The city must start submitting NCR to the Enforcement Branch for effluent exceedances.**

<u>Additional Comments</u>:

Although not listed as violations, the following items require attention:

- **Blades on rotors are missing. The city is in the process of upgrading and repairing the treatment plant.**
- **Floatables are accumulated on the oxidation ditch walkways.**
- **Minor housekeeping with scum accumulation in clarifier troughs.**
- **The contract lab needs to use the operator's daily flow for loading calculations.**

GENERAL COMMENTS

On Tue, Aug 18, 2020, an inspection was conducted with the inspection participants listed above. The inspection was conducted as a follow-up to the site visit performed by the Circuit Riders program in Feb 2020. The inspection consisted of a site assessment and a records review.

Site Assessment:

Treatment consists of onsite lift station, optional EQ basin (wet weather), preliminary (vortex screen with grit removal), oxidation ditch for activated sludge, secondary clarifiers (2; ran in series), dosing tank (flow equalization), intermittent sand filters (4; for polishing), UV disinfection, primary/secondary flow measurement, post-aeration, discharge to Outfall 001. Sludge is wasted to an aerobic digester, dewatered on sludge drying beds, and then hauled to landfill.

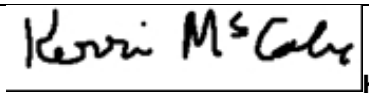
The system had been off bypass for about two months (dry weather conditions), and the city was utilizing the intermittent sand filters for polishing. Sludge color in the oxidation ditch was still a bit dark, but sludge quality had improved. The sludge blanket in the first clarifier was high, but sludge looked healthy. There was little to no sludge blanket in the second clarifier. The intermittent sand filters were being used during the inspection, and there were some accumulated sludge/algae on the beds. The treatment plant is under-designed and experiences excessive I&I, which causes several O&M issues throughout the plant, to include: clogging preliminary, turbulence in the oxidation ditch, washing sludge out of the clarifiers, clogging intermittent sand filters (requires bypass), and sludge build-up at the outfall. The city is scheduled for major repairs/upgrades to the collection system and treatment plant starting in late 2020.

As a contingency for wet weather, the city has emptied the EQ basin and is keeping the intermittent sand filters rotated and cleaned.

As a follow-up to the Circuit Riders evaluation, the city acknowledged the importance for process control measures and documentation, and they have plans to establish more refined protocols once the treatment plant is stabilized.

Records Review:

Records for April and Nov 2019 were requested and supplied. The city collects/analyzes for flow, DO, and pH; and a contract lab conducts the other conventional parameters. Records were organized and readily available. With the exception of the items mentioned in "Summary of Findings," records were complete. In-house records for DO and pH will be reviewed with the city on August 24, 2020.

INSPECTOR'S SIGNATURE: 	**Kerri McCabe**	DATE: **8/21/2020**
SUPERVISOR'S SIGNATURE: 	**Jason Bolenbaugh**	DATE: **8/31/2020**

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: **Coordinates for outfall need to be adjusted during permit renewal.**	☑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: **Operator collects/analyzes for flow, DO, and pH; contract lab for CBOD5, TSS, NH3-N, and FCB.**	
1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS: **See DMR Calculation Checks; NCR are to be submitted for exceedances.**	☐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: **Contract lab is using flow measured during sample collection for loading calculations; April 2019 cannot be duplicated.**	☐Y ☑N ☐NA ☐NE

SECTION C: OPERATIONS AND MAINTENANCE

TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED	☐S ☐M ☑U ☐NA ☐NE
DETAILS: **Preliminary (vortex screening with grit removal), EQ basin, activated sludge oxidation ditch, clarifiers (2), dosing tank (equalize flow), intermittent sand filters (4), UV disinfection, primary/secondary flow measurement, and post-aeration. Sludge is routed to a digester and dewatered on drying beds (4) before hauling to landfill.**	
1. TREATMENT UNITS PROPERLY OPERATED: **Plant is under-designed and experiences excessive I&I; operated at the best of their abilities.**	☑S ☐M ☐U ☐NA ☐NE
2. TREATMENT UNITS PROPERLY MAINTAINED: **Rotors are missing blades; minor housekeeping.**	☐S ☑M ☐U ☐NA ☐NE
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED: **Generator onsite.**	☑S ☐M ☐U ☐NA ☐NE
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE:	☑S ☐M ☐U ☐NA ☐NE
5. ALL NEEDED TREATMENT UNITS IN SERVICE:	☑S ☐M ☐U ☐NA ☐NE
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED: **Three Class III; one Class II**	☑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: **More refined process control procedures will be established once the city has a stabilized treatment plant.**	☑Y ☐N ☐NA ☐NE
10. PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED: **Can route to EQ basin and digester.**	☑Y ☐N ☐NA ☐NE
11. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR: **Bypass of intermittent sand filters due to excessive flows from I&I.**	☑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: **Plant and collection system are scheduled for major upgrades and repairs starting 2020.**	☑Y ☐N ☐NA ☐NE
14. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT:	☑Y ☐N ☐NA ☐NE
15. IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT: **Effluent quality has suffered due to hydraulic overload and subsequent bypasses.**	☑Y ☐N ☐NA ☐NE

SECTION D: SAMPLING	
PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS	☑S ☐M ☐U ☐NA ☐NE
DETAILS: **Operator collects/analyzes for flow, DO, and pH; contract lab for CBOD5, TSS, NH3-N, and FCB.**	
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: **Yes** TYPE OF DEVICE: **6" open flow nozzle (parabolic)**	☑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: **ISCO 4230 Bubbler Flowmeter**	☑Y ☐N ☐NA ☐NE
4. CALIBRATION FREQUENCY ADEQUATE: **Last calibrated by qualified technician in Oct 2010; operator completes accuracy checks and can calibrate meter.**	☐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: **Operator collects/analyzes for flow, DO, and pH; contract lab for CBOD5, TSS, NH3-N, and FCB.**	
1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(B) FOR SLUDGES) :	☑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: **Arkansas Testing Laboratories**	
b. LAB ADDRESS: **3301 Langley Drive, Searcy, AR 72143**	
c. PARAMETERS PERFORMED: **CBOD5, TSS, NH3-N, and FCB**	
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: **Observed at primary device and receiving stream; visual observations only.**

OUTFALL #:	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	COLOR	OTHER
001	NO	NO	NO	SLIGHT; not persistent	NO	CLEAR	--

SECTION H: SLUDGE DISPOSAL

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

DETAILS: **Sludge is routed to aerobic digester, dewatered on sludge drying beds, and then hauled to landfill.**

1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY: **Hydraulic overloading causes sludge to wash-out.** ☑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): **N/A**

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: **Part II, Condition 6 requires BMP for stormwater protection; no issues noted during inspection.**

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

DMR Calculation Check

Reporting Period: From 2019 (Year) April (Month) 01 (Day) To 2019 (Year) April (Month) 30 (Day)

Parameter Checked: NH3-N

	Loading Mass (lbs/day) Mon. Avg.	Concentration (mg/l) Mon. Avg.	Concentration (mg/l) 7-Day Avg.
Reported Value:	13.35	6.9	6.9
Calculated Value:	18.2	6.9	6.9
Permit Value:	5.8	4	4

If calculated value does not equal reported value, explain:
4/3: 6.9 mg/l x 0.316 MGD x 8.34 = 18.2 lbs/day; used operator's daily flow.
The results cannot be duplicated using daily flow, instanteous flow measured during sample collection, or Monthly Average flow. This is a REPEAT issue from the 2017 inspection. The contract lab is to use the DAILY FLOW supplied by the operator for loading calculations reported on DMR.

NH3-N is exceeded for Loading and Concentration; no Non-compliance Report (NCR) is available for review.

DMR Calculation Check

Reporting Period: From **2019** (Year) **Nov** (Month) **01** (Day) To **2019** (Year) **Nov** (Month) **31** (Day)

Parameter Checked: **CBOD5**

	Loading Mass (lbs/day)	Concentration (mg/l)	
	Mon. Avg.	Mon. Avg.	7-Day Avg.
Reported Value:	9	10.5	10.5
Calculated Value:	16.6	10.5	10.5
Permit Value:	15	10	15

If calculated value does not equal reported value, explain:
11/6: 10.5 mg/l x 0.190 MGD x 8.34 = 16.6 lbs/day; used operator's daily flow.
Values are not the same; contract lab used flowmeter reading for loading calculation. The contract lab is to use the DAILY FLOW supplied by the operator for loading calculations reported on DMR.

CBOD5 is exceeded for Loading and Concentration; no Non-compliance Report (NCR) is available for review.

Office of Water Quality Photographic Evidence Sheet					
Location:	**City of Flippin POTW**				
Photographer:	**Kerri McCabe**	Date:	**Aug 18, 2020**	Time:	**1005**
Witness:				Photo #:	**1**
Description:	**The only lift station for the entire collection system for the city.**				

Photographer:	**Kerri McCabe**	Date:	**Aug 18, 2020**	Time:	**1007**
Witness:				Photo #:	**2**
Description:	**EQ basin; note water level is low for contingency for wet weather.**				

Office of Water Quality Photographic Evidence Sheet					
Location:	**City of Flippin POTW**				
Photographer:	**Kerri McCabe**	Date:	**Aug 18, 2020**	Time:	**1009**
Witness:				Photo #:	**3**
Description:	**Onsite generator for mechanical plant.**				

Photographer:	**Kerri McCabe**	Date:	**Aug 18, 2020**	Time:	**1009**
Witness:				Photo #:	**4**
Description:	**Preliminary consisting of vortex screening and grit removal (funnel-shaped chamber); screenings placed in dumpster and hauled to landfill.**				

Office of Water Quality Photographic Evidence Sheet					
Location:	**City of Flippin POTW**				
Photographer:	**Kerri McCabe**	Date:	**Aug 18, 2020**	Time:	**1011**
Witness:				Photo #:	**5**
Description:	**RAS and influent combining prior to oxidation ditch; screening installed for when preliminary is shut-off during I&I.**				

Photographer:	**Kerri McCabe**	Date:	**Aug 18, 2020**	Time:	**1011**
Witness:				Photo #:	**6**
Description:	**Oxidation ditch; note color of sludge and blades missing from rotors.**				

Office of Water Quality Photographic Evidence Sheet					
Location:	**City of Flippin POTW**				
Photographer:	**Kerri McCabe**	Date:	**Aug 18, 2020**	Time:	**1013**
Witness:				Photo #:	**7**
Description:	**Activated sludge is dark and foamy.**				

Photographer:	**Kerri McCabe**	Date:	**Aug 18, 2020**	Time:	**1014**
Witness:				Photo #:	**8**
Description:	**Flows into oxidation ditch cause excessive turbulence.**				

Office of Water Quality Photographic Evidence Sheet					
Location:	**City of Flippin POTW**				
Photographer:	**Kerri McCabe**	Date:	**Aug 18, 2020**	Time:	**1015**
Witness:				Photo #:	**9**
Description:	**First clarifier with sludge blanket at top; trough needs to be cleaned.**				

Photographer:	**Kerri McCabe**	Date:	**Aug 18, 2020**	Time:	**1020**
Witness:				Photo #:	**10**
Description:	**Second clarifier (in series) with little to no sludge.**				

Office of Water Quality Photographic Evidence Sheet					
Location:	**City of Flippin POTW**				
Photographer:	**Kerri McCabe**	Date:	**Aug 18, 2020**	Time:	**1022**
Witness:				Photo #:	**11**
Description:	**Dosing tank to equalize flow into intermittent sand filters.**				

Photographer:	**Kerri McCabe**	Date:	**Aug 18, 2020**	Time:	**1024**
Witness:				Photo #:	**12**
Description:	**Intermittent sand filter in use during inspection.**				

Office of Water Quality Photographic Evidence Sheet					
Location:	**City of Flippin POTW**				
Photographer:	**Kerri McCabe**	Date:	**Aug 18, 2020**	Time:	**1029**
Witness:				Photo #:	**13**
Description:	**UV disinfection**				

Photographer:	**Kerri McCabe**	Date:	**Aug 18, 2020**	Time:	**1037**
Witness:				Photo #:	**14**
Description:	**Launder to keep UV bulbs submerged in effluent.**				

Office of Water Quality Photographic Evidence Sheet					
Location:	**City of Flippin POTW**				
Photographer:	**Kerri McCabe**	Date:	**Aug 18, 2020**	Time:	**1031**
Witness:				Photo #:	**15**
Description:	**Secondary flowmeter; last calibrated in Oct 2010.**				

Photographer:	**Kerri McCabe**	Date:	**Aug 18, 2020**	Time:	**1039**
Witness:				Photo #:	**16**
Description:	**Primary flow device (parabolic nozzle) with bubbler flowmeter installed in correct location.**				

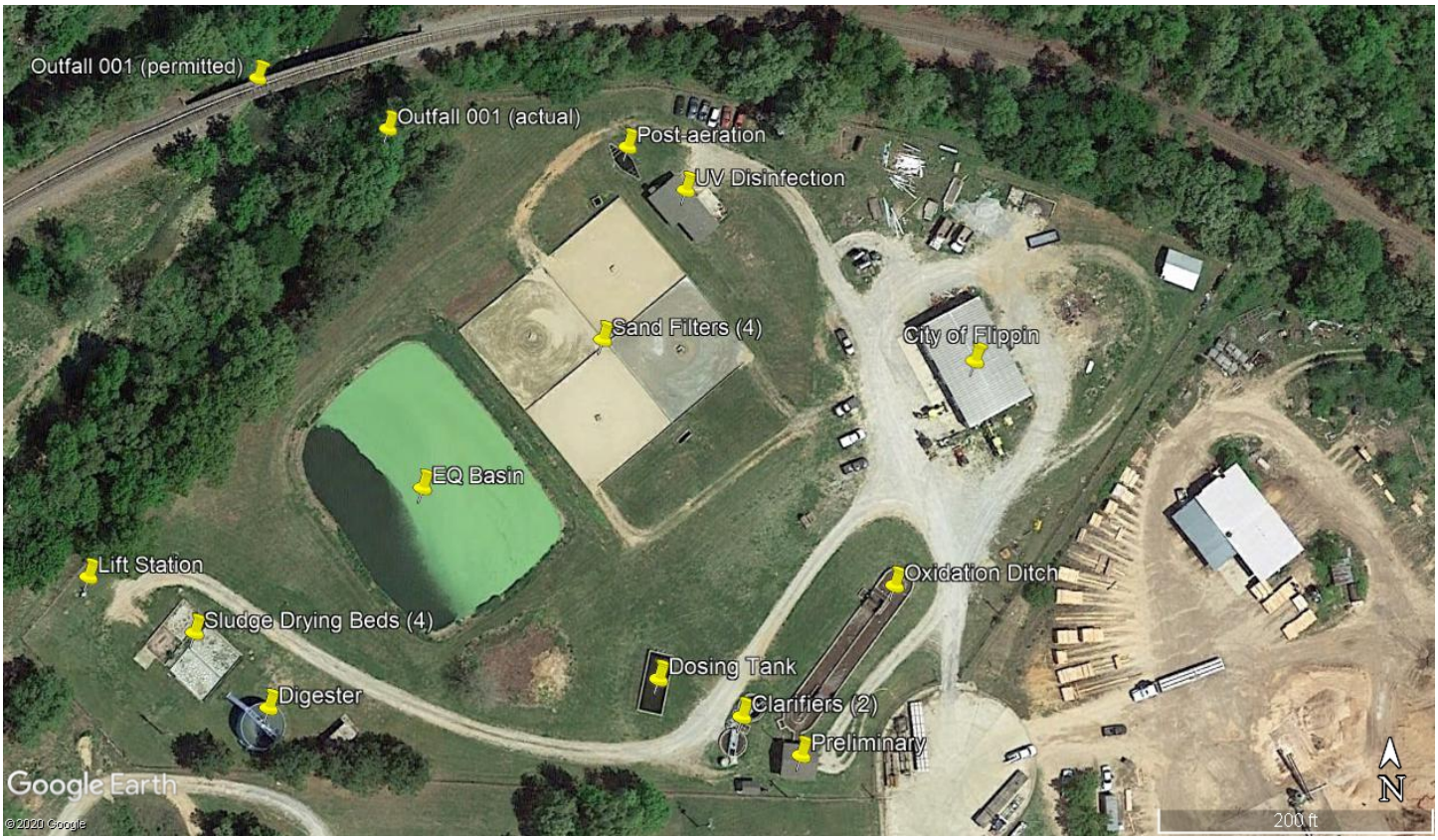
Office of Water Quality Photographic Evidence Sheet					
Location:	**City of Flippin POTW**				
Photographer:	**Kerri McCabe**	Date:	**Aug 18, 2020**	Time:	**1040**
Witness:				Photo #:	**17**
Description:	**Post-aeration prior to receiving stream.**				

Photographer:	**Kerri McCabe**	Date:	**Aug 18, 2020**	Time:	**1043**
Witness:				Photo #:	**18**
Description:	**Outfall 001 at receiving stream; algae accumulation only; slight foaming**				

Office of Water Quality Photographic Evidence Sheet					
Location:	**City of Flippin POTW**				
Photographer:	**Kerri McCabe**	Date:	**Aug 18, 2020**	Time:	**1007**
Witness:				Photo #:	**19**
Description:	**Aerobic digester for wasted sludge.**				

Photographer:	**Kerri McCabe**	Date:	**Aug 18, 2020**	Time:	**1006**
Witness:				Photo #:	**20**
Description:	**Sludge drying beds to dewater sludge prior to hauling to landfill.**				

Figure 1. Google Earth image dated May 4, 2014 depicting City of Flippin POTW with major components identified.



From: McCabe, Kerri
To: McConnell, Melissa
Subject: FW: INSPECTION REPORT RESPONSE
Date: Wednesday, September 16, 2020 7:39:17 AM
Attachments: image001.png

Melissa,

Please attach this email to City of Flippin (AR0021717). You processed it and should have the PDS number written down somewhere. Thank you.

Ms. Kerri McCabe | Inspector Supervisor
Division of Environmental Quality | **Office of Water Quality**
Compliance Branch
5301 Northshore Drive | North Little Rock, AR 72118
t: 501.682.0642 | c: 501.352.5641 | e: mccabe@adeq.state.ar.us

From: J.L. Wagoner [mailto:cofmaintenance@hotmail.com]
Sent: Tuesday, September 15, 2020 11:31 AM
To: McCabe, Kerri
Subject: INSPECTION REPORT RESPONSE

#2. Secondary Flowmeter-Calibration:
Instrument Supply completed the test to calibrate today.

#3. Effluent exceedances-
We have been reporting to our Enforcement officer(Layne Pemberton).
We have been attaching the NCR on the DMR per Layne and reporting SSO/Bypasses within the 24 hour period.

J.L. Wagoner
Public Works Director
Work 870-453-8300
City of Flippin
P.O. Box 40
Flippin Ar. 72634