



January 20, 2021

Stephanie Orman, Mayor City of Bentonville 117 West Central Avenue Bentonville, AR 72712

RE: City of Bentonville WWTP Inspection AFIN: 04-00154 Permit No.: AR0022403

Dear Ms. Orman:

On December 3, 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 inspection report and provide a written response for each item that was noted. This response should be mailed to the attention of the Office of Water Quality Compliance Branch at the address below my signature or emailed to Water-Inspection-Report@adeq.state.ar.us. This response should contain documentation describing the course of action taken to correct each item noted. The corrective action(s) should be completed as soon as possible and the written response with all necessary documentation (i.e. photos) is due by February 4, 2021.

If I can be of any assistance please contact me at <u>cole.southerland@adeq.state.ar.us</u> or (501) 837-2093.

Sincerely,

Cole fortherland

Cole Southerland Inspector, Office of Water Quality 5301 Northshore Drive, North Little Rock, AR, 72118

ABKE		-		FICE OF W)N I		RT	
. ENERG	QUALITY	AF	IN: 04-00154 P	ERMIT #: AR002	24	03		DATE	: 12/3/2020
X	440 ENVINC		OUNTY: 04 Bento			-	#: 114615		MEDIA: WN
				LONG: -94.2037					
NAME	FACILITY INFORMAT	ION		FACILITY TYPE:	IS	PEC		RMATI	ON
City of Bentonville WWTP				1 - Municipal			61 S - Stat		
1901 NE A Street				3 - Satisfactory			-		ce Evaluation
стту: Bentonville						30	EXIT TIME: 11:00		IT EFFECTIVE DATE:
	RESPONSIBLE OFFIC		_	12/3/2020 0	J9.	.30	11:00		0/2019 IT EXPIRATION DATE:
	: / TITLE		-					-	0/2025
COM	ephanie Orman / Mayor			FAYETTEVILLE	ES	SHAL	E RELATE	D: N	
	y of Bentonville			FAYETTEVILLE	ES	SHALI	E VIOLATI	ONS: N	l
	7 West Central Avenue						ION PART	ICIPAN	NTS
CITY, STATE, ZIP: Bentonville AR 72712 PHONE & EXT: / FAX: 479-271-5966 / EMAIL: sorman@bentonville.com				NAME/TITLE/PHONE/FAX/EMAIL/ETC.: Nancy Busen, Facility Manager, City of Bentonville Chris Earl, Operations Supervisor, City of Bentonville Roman Rios, Lab Supervisor, City of Bentonville Cole Southerland, OWQ Inspector, DEQ					
	NTACTED DURING INSPECTION:								
			tory, M=Marginal, U=Unsa	tisfactory, N=Not Applicable	e/E\				
S M	PERMIT RECORDS/REPORTS	S S	FLOW MEASU			S S	STORMW FACILITY		
S	OPERATION & MAINTENANCE	S		CEIVING WATER	2	S			
S	SAMPLING	S		DLING/DISPOSAL		N	PRETRE/		
Ν	OTHER:								
			SUMMARY (OF FINDINGS					
Th	The following violation was noted during the inspection and records review: The facility exceeded Permit values for BOD in May 2020. Roman Rios, Lab Supervisor, stated that the exceedance occurred because tubing in sampler had not been cleaned for a couple of months. Tubing is now cleaned every month. A Non-Compliance report was not completed for this exceedance. Please ensure that a Non-Compliance report is generated and submitted to the Department.								
				COMMENTS					
Th	 OBLICKAL COMMENTS The following was noted during the inspection: All significant maintenance that was being conducted during previous inspection had been completed. New project of replacing all internal components of the grit chamber started in July of 2020. This is being done because in October of 2019 top arm in grit chamber broke due to a rusted bolt. Maintenance of grit chamber has been halted due to weather and COVID-19 concerns and will resume in 2021. New rotors and rotor coverings were installed in Oxidation Ditch #1 and Oxidation ditch #2. Replacement rotor coverings are stainless steel to eliminate rusting. 								

• Parts of the collection system were inspected and found to be working properly. Each lift station is checked at least once per week in person and daily through SCADA system.

INSPECTOR'S SIGNATURE:	
INSPECTOR'S SIGNATURE: Cole Southerland	DATE: 12/28/2020
SUPERVISOR'S SIGNATURE: Brent L. Walker	DATE: 1/19/2021

Inspection Report: City of Bentonville WWTP, AFIN: 04-00154, Permit #: AR0022403

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	ØS OM OU ONA ONE
DETAILS:	
1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS:	
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE:	🗹 s 🗆 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:	🗹 y 🗆 n 🗆 na 🗇 ne
e. RESULTS OF CALIBRATIONS:	
f. RESULTS OF ANALYSES:	
g. DATES AND TIMES OF ANALYSES:	
h. NAME OF PERSON(S) PERFORMING ANALYSES:	🗹 y 🗆 n 🗆 na 🗆 ne
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE:	Øs 🗆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:	
SECTION C: OPERATIONS AND MAINTENANCE	
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED	
DETAILS:	
1. TREATMENT UNITS PROPERLY OPERATED:	
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:	
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	
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:	
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:	
SECTION E: FLOW MEASUREMENT	
PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS	ØS OM OU ONA ONE
DETAILS:	
1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: Y TYPE OF DEVICE: 18" Parshall Fl	
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED:	
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED: ISCO 3010 UI	
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	ØS OM OU ONA ONE
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 ≥10% OF THE TIME:	
7. COMMERCIAL LABORATORY USED:	Øy 🗆n 🗆na 🖾ne
a. LAB NAME:	
b. LAB ADDRESS:	
C. PARAMETERS PERFORMED:	
8. BIOMONITORING PROCEDURES ADEQUATE:	
b. PROPER DILUTION SERIES FOLLOWED:	
d. RETESTS AND/OR TRE PERFORMED AS REQUIRED:	ØY 🗆 N 🗆 NA 🖾 NE

SECTION G	EFFLUENT/R									
BASED ON	VISUAL OBS	ERVATIONS (ONLY							
DETAILS:										
OUTFALL #:	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	COLOR	OTHER			
001	None	None	None	None	None	Clear				
SECTION H: SLUDGE DISPOSAL										
SLUDGE D	SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS									
DETAILS:										
1. SLUDGE M	IANAGEMENT ADEQU	ATE TO MAINTAIN EF	FLUENT QUALITY:			⊠s ⊡m				
2. SLUDGE R	ECORDS MAINTAINED	AS REQUIRED BY 4	0 CFR 503:			⊠s ⊡m				
3. FOR LAND	APPLIED SLUDGE, TY	PE OF LAND APPLIE	D TO: (E.G., FOREST	, AGRICULTURAL, PU	BLIC CONTACT SITE):					
SECTION I:	SAMPLING IN	SPECTION PRO	OCEDURES							
SAMPLE F	RESULTS WITH	HIN PERMIT R	EQUIREMENT	ſS]U ⊠NA ⊡NE			
DETAILS:										
1. SAMPLES	OBTAINED THIS INSPE	ECTION:				ΠY	On Øna One			
2. TYPE OF S	AMPLE: GRAB:		METHOD: FREQUE	ENCY:						
3. SAMPLES	PRESERVED:					ΠY	⊡n Øna ⊡ne			
4. FLOW PRO	PORTIONED SAMPLE	S OBTAINED:				ΠY	⊡n Øna ⊡ne			
5. SAMPLE O	BTAINED FROM FACIL	LITY'S SAMPLING DE	VICE:				🗆 n 🗹 na 🗆 ne			
6. SAMPLE R	EPRESENTATIVE OF	VOLUME AND NATUR	E OF DISCHARGE:			ΠY	🗆 n 🗹 na 🗆 ne			
7. SAMPLE S	PLIT WITH PERMITTE	Ε:								
8. CHAIN-OF-	CUSTODY PROCEDU	RES EMPLOYED:								
9. SAMPLES	COLLECTED IN ACCO	RDANCE WITH PERM	1IT:			ΠY	⊡n Øna ⊡ne			
	: STORM WAT		-							
	ATER MANAG	EMENT MEET	IS PERMIT RE		6]U ⊠NA ⊡NE			
DETAILS:										
1. SWPPP UF	PDATED AS NEEDED:	DATE OF LAST UP	PDATE:							
2. SITE MAP	INCLUDING ALL DISCH	HARGES AND SURFA	CE WATERS:				⊡n Øna ⊡ne			
3. POLLUTIO	N PREVENTION TEAM	IDENTIFIED:								
4. POLLUTIO	4. POLLUTION PREVENTION TEAM PROPERLY TRAINED:									
5. LIST OF PO	DTENTIAL POLLUTANT	SOURCES:								
	DTENTIAL SOURCES A									
	TORM WATER DISCH	ARGES ARE AUTHOR	RIZED:							
8. LIST OF ST	RUCTURAL BMPS:									
9. LIST OF NO	ON-STRUCTURAL BMF	PS:								
10. BMPS PRC	PERLY OPERATED A	ND MAINTAINED:								
11. INSPECTIO	ONS CONDUCTED AS I	REQUIRED:				ΔY	□n Øna □ne			

Inspection Report: City of Bentonville WWTP, AFIN: 04-00154, Permit #: AR0022403

FLOW CALCULATION SHEET

Date: 12/	/03/2020	Time: 10:	30		
	03/2020		.50		
Head in Inc	ches: 9.5 "	Feet:	0.79'		
	a of Drimony Fla	Magauran	mant Daviage	10" Doroholl	
	e of Primary Flow		nent Device.	IO FAISIIAII	Fiume
Name & Mo	odel of Secondar	y Flow Mea	asurement De	vice: ISCC	0 3010 Ultrasonic
				0/40/00	
Date of last	t Calibration of S	econdary F	Iow Device:	3/10/20	
Recorded I	Flow at Date & Ti	ime Listed A	Above: 2.43	7	(Facility Flow Meter)
			I		
	Flow at Date & 1				
Flow is calcula	ted using flow charts in	: ISCO Open C	hannel Flow Measi	urement Handboo	ok-5 ^{°°} Edition)
0/ Error	Recorded Valu	ie - Calo	culated Value	X 100	
% Error = Calculated Value X 100					
	Cal	culated Val	ue		
		culated Val			
	Cal	-	ue 2.695	- X 100 -	
% Error =		culated Val			
% Error =		2.695			
% Error =	2.437	-			
% Error = % Error =	2.437 .258 2.695	2.695			
% Error =	2.437 .258	2.695			
% Error = % Error =	2.437 .258 2.695	2.695			
% Error = % Error = % Error =	2.437 .258 2.695 0.09 9	- 2.695 - X 100 X 100			

DMR Calculation Check

Reporting Period:	From	<u>2020</u> Year	08 Month	01 Day	_ To _	2020 Year	08 Month	31 Day
Parameter Checked:	(Fecal Coliform	_					
		Loading Mass				Concen Mon		
	Mo.	Avg Ibs/c	day	Mo. A	vg r	ng/l	7-day Avg	mg/l
Reported Value:		N/A			4		11	
Calculated Value:		N/A			3.89		11	
Permit Value:		N/A			200		400)

If calculated value does not equal reported value, explain:

DMR Calculation Check

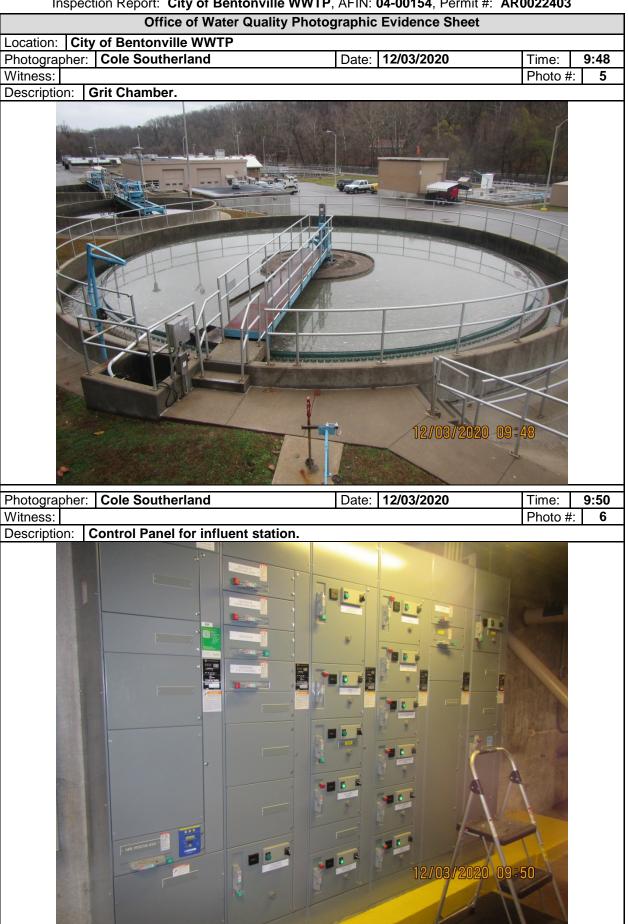
Reporting Period:	From <u>2020</u> Year	05 Month	<u>01</u> To Day	2020 Year	05 Month	<u>31</u> Day
Parameter Checked:	Ammonia	-				
	Loading Mass			Concer Mon		
	Mo. Avg Ibs/c	lay	Mo. Avg	mg/l	7-day Avg	mg/l
Reported Value:	2		0.05		0.1	
Calculated Value:	1.6		0.05		0.1	
Permit Value:	53.4		1.6		2.4	

If calculated value does not equal reported value, explain:





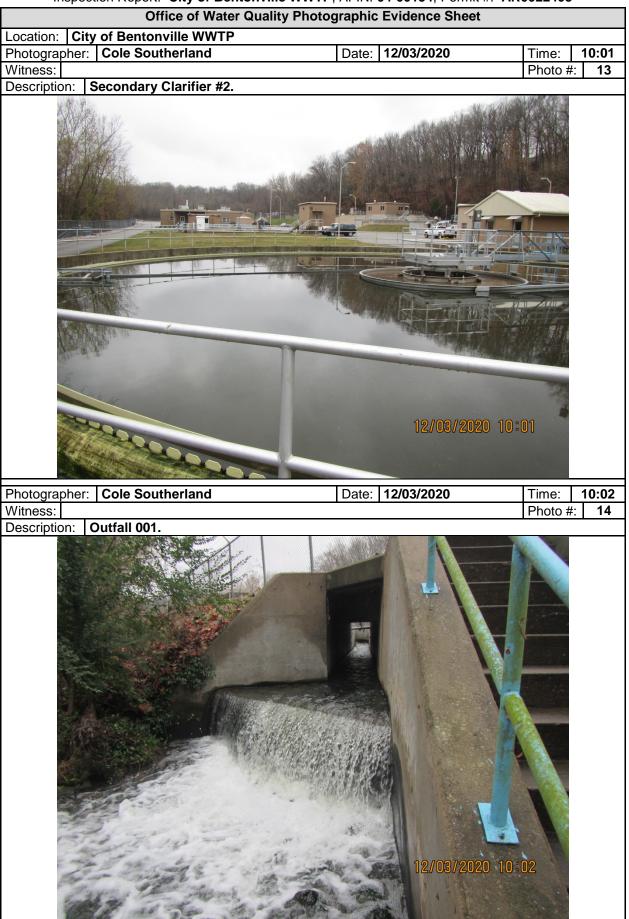






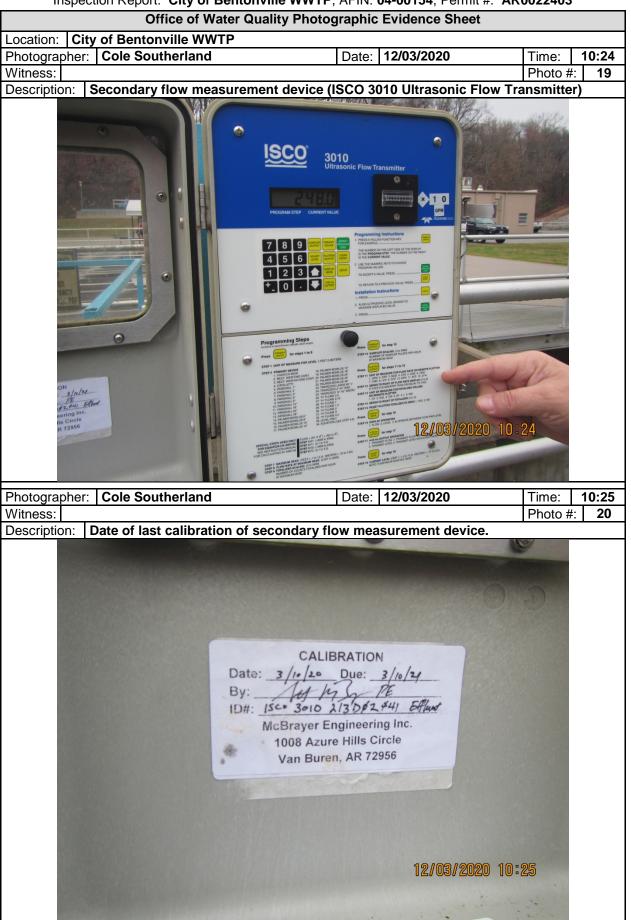
	Photographic Evidence Sheet	
Location: City of Bentonville WWTP		
Photographer: Cole Southerland	Date: 12/03/2020	Time: 9:57
Witness:		Photo #: 9
Description: Oxidation Ditch #1.		
	12/03/2020	
Photographer: Cole Southerland	Date: 12/03/2020	Time: 9:57
Witness: Description: Oxidation Ditch #2.		Photo #: 10
<image/>		09:57





Office of Water Quality Photo	ographic Evidence Sheet	
Location: City of Bentonville WWTP		
Photographer: Cole Southerland	Date: 12/03/2020	Time: 10:02
Witness:		Photo #: 15
Description: Outfall 001.		CO MARTIN Y
	12/03/2020 10:	02
Photographer: Cole Southerland	Date: 12/03/2020	Time: 10:07
Witness:		Photo #: 16
<text></text>		

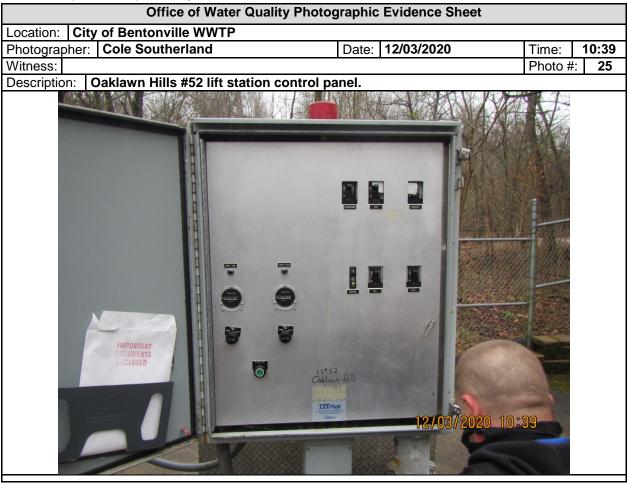
Office of Water Quality Pho	tographic Evidence Sheet	
Location: City of Bentonville WWTP		
Photographer: Cole Southerland	Date: 12/03/2020	Time: 10:08
Witness:		Photo #: 17
Description: Sludge dewatering press.	4	
		. 018
Photographer: Cole Southerland	Date: 12/03/2020	Time: 10:16
Witness: Description: Spare parts in maintenance building		Photo #: 18
Description. Typice parts in maintenance building		16







Inspection Report: City of Bentonville WWTP, AFIN: 04-00154, Permit #: AR0022403







February 2, 2021

Stephanie Orman, Mayor City of Bentonville 117 West Central Avenue Bentonville, AR 72712

RE: Response to Inspection AFIN: 04-00154

Permit No.: AR0022403

Dear Ms. Orman:

I have reviewed the response pertaining to my December 3, 2020 inspection of the City of Bentonville WWTP. The non-compliance letter received June 8, 2020 and non-compliance report received January 27, 2021 sufficiently address the items 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 I require further information concerning this matter I will contact you. Thank you for your attention to this matter. Should you have any questions please contact me at (501) 837-2093 or you may email me at <u>cole.southerland@adeq.state.ar.us</u>.

Sincerely,

Cole fortherland

Cole Southerland Inspector, Office of Water Quality 5301 Northshore Drive, North Little Rock, AR, 72118