



December 12, 2022

Darrell Trahan, Mayor City of Huntsville P.O. Box 430 Huntsville, AR 72740 Via email: <u>mayor@huntsvillear.org</u> & <u>sean.davis@huntsville-water.com</u>

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

Dear Honorable Mayor Trahan:

On February 10, 2022, 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 <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. 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 **December 29, 2022**.

If I can be of any assistance please contact me at grimes@adeq.state.ar.us or 501-837-2067.

Sincerely,

Ramo Drimes

Garrett Grimes Inspector, Office of Water Quality 5301 Northshore Drive, North Little Rock, AR, 72118

		OFFICE OF WATER QUALITY									
and a second		INSPECTION REPORT									
V. ENER		AFIN: 44-00018 PERMIT #: AR002200			2004	004 DAT		2/10/2022			
6,	AND ENVIRON	CC	UNTY: 44 Mac	dison		PDS	#: 123787		MEDIA: WN		
		GF	S LAT: 36.112	386 LC	NG: -93.73 2	2969	LOCATION:	General	Area		
	FACILITY INFORMAT	ION			IN	ISPEC	CTION INFOF	RMATIO	Ν		
	ntsville WWTF			1 -	FACILITY TYPE: INSPECTOR ID#: 1 - Municipal 104111 S - State						
	187 Madison Hwy 23			3 - 3	ry evaluation ratin Satisfactory		Com	TION TYPE: pliance	Evaluation		
Hu	ntsville			DATE(,	NTRY TIME	EXIT TIME: 11:47		FFECTIVE DATE:		
	RESPONSIBLE OFFIC	CIAL						6/1/20 PERMIT EX	J'I 'I XPIRATION DATE:		
								5/31/2	2014		
Darrell Trahan / Mayor					FAYETTEVILLE SHALE RELATED: N						
	y of Huntsville				FAYETTEVILLE SHALE VIOLATIONS: N						
	ng address: D. Box 430			173	INSPECTION PARTICIPANTS						
	STATE, ZIP:				NAME/TITLE/PHONE/FAX/EMAIL/ETC.:						
	ntsville AR 72740				Bill Eoff, Wastewater Superintendent, City of						
	NE & EXT: / FAX: 9-738-6929 /				Huntsville Water Utilities; Sean Davis, Executive Director, City of Huntsville						
EMAI					Water Utilities;						
	yor@huntsvillear.org &				Garrett Grimes, District 1 Inspector, DEQ						
	an.davis@huntsville-water.com					,		,	-		
CC	INTACTED DURING INSPECTION:	No									
	(S=Si	atisfac	AREA EV tory, M=Marginal, U=Un			e/Evaluate	ed)				
S	PERMIT	S FLOW MEASUR				N		ATER			
Μ	RECORDS/REPORTS	S LABORATORY				Ν	FACILITY	SITE RE	VIEW		
Μ	OPERATION & MAINTENANCE	S							IG PROGRAM		
S	SAMPLING	S SLUDGE HANDLING/DISPOSAL N PRETREATMENT									
Ν	N OTHER:										
SUMMARY OF FINDINGS											
The following items were noted during the inspection:											

 Discharge Monitoring Report (DMR) calculation checks revealed differences compared to the reported values of Monthly Average Concentrations of Nitrate-Nitrite Nitrogen and Total Phosphorus (See report pages 7 & 8). These are violations of Part III.C.5 of the permit. Reported values must represent the monitoring results. Reported values must be rounded to the significance specified in the permit.

On March 15, 2022, Bill Eoff, Wastewater Superintendent, contacted DEQ after being alerted to the discrepancies noted above. According to Mr. Eoff, a form of flow weighting is being used when calculating monthly average concentrations based off of previous guidance from DEQ. Mr. Eoff was informed during the conversation that language for flow weighting monthly average concentrations is not present in the current permit.

2. At the time of the inspection, Mr. Eoff and Sean Davis, Executive Director, stated that the clarifiers had been recently cleaned. However, microbial growth was accumulating in the weirs of the clarifiers in several locations (Photo #1). In addition, wastewater was exiting through holes in the weirs (Photo #1). This is a violation of Part III.B.1.a of the permit.

- Significant erosion is occurring along the west perimeter including along the aeration basins (Photo #2). The City of Huntsville has attempted to create earthen trenches to redirect the flow, but these trenches do not fully remediate the problem according to Mr. Eoff and Mr. Davis (Photo #2). The City of Huntsville should consider additional stabilization methods/structures to prevent erosion and potential damage to the treatment units from occurring.
- Excessive turbulence was observed in the H-flume preceding Outfall 001 (Photo #3). This turbulence did not appear to affect the calibration check of the secondary flow measurement device. However, improvements to the facility to address this turbulence should be considered.
- During the previous November 6, 2019, inspection it was noted that the insulation from the sludge dryer was leaking onto the ground due to excessive heat. In 2020 the sludge dryer was damaged in a fire. During the walkthrough the sludge drying room was free of leaked insulation and none was observed leaking from the sludge dryer (Photos #4 - #5). The sludge dryer was operational at the time of the inspection and appeared to be operating within design specifications.
- Larry Garrett is currently the listed contact associated with this permit. However, Mr. Davis is the actual permit contact for this facility. The City of Huntsville must contact the DEQ Office of Water Quality Permits Branch and update this information.
- Mr. Eoff and Mr. Davis were both enthusiastic and knowledgeable about the operation of the wastewater treatment facility. The facility appeared clean and well managed at the time of the inspection.

INSPECTOR'S SIGNATURE: Same Garrett Grimes	DATE: 3/18/2022
Brost 2 Walker	DATE: 12/2/2022

Inspection Report: Huntsville WWTF, AFIN: 44-00018, Permit #: AR0022004

SECTION A: PERMIT VERIFICATION	(0022007
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: See attached calculation checks	
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE:	Øs 🖙 🗆 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:	Øy 🛛 n 🖾 na 🖾 ne
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:	DY 🗹 N 🗆 NA 🗆 NE
	🛛 Y 🖾 N 🖾 NA 🖾 NE

SECTION D: SAMPLING	
PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS	
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: 2' TYPE OF DEVICE: H-Flume	
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED:	
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: Some turbulence p	oresent DY DN DNA DNE
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: <u>GTS, Inc.</u>	
b. LAB ADDRESS: 1915 N. Shiloh Drive, Fayetteville, AR 72704	
c. PARAMETERS PERFORMED: FCB, Total Phos, CBOD5, TSS, Ammonia-N, Nitrate + Nitrate Nitrogen	
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	ØS 🗆 M 🗆	IU 🗆 NA 🗆 NE							
DETAILS:									
OUTFALL #:	COLOR	OTHER							
001	None	None	None	None	None	Clear			
SECTION H	I: SLUDGE DIS	POSAL							
SLUDGE D	DISPOSAL MEI	ETS PERMIT F	REQUIREMEN	ГS		ØS 🗆 M 🗆			
DETAILS:									
1. SLUDGE M	IANAGEMENT ADEQU	ATE TO MAINTAIN EF	FLUENT QUALITY:			□s □m			
2. SLUDGE R	ECORDS MAINTAINED	D AS REQUIRED BY 40) CFR 503:			□s □m			
3. FOR LAND	APPLIED SLUDGE, T	YPE OF LAND APPLIEI	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			IU ⊠NA ⊡NE		
DETAILS:									
1. SAMPLES	OBTAINED THIS INSP	ECTION:				ΠY	🗆 n 🗹 na 🗆 ne		
2. TYPE OF S	AMPLE: GRAB:		IETHOD: FREQUE	NCY:					
3. SAMPLES	PRESERVED:					ΠY	□n Øna □ne		
4. FLOW PRC	PORTIONED SAMPLE	S OBTAINED:				ΠY	⊡n Øna ⊡ne		
5. SAMPLE O	BTAINED FROM FACI	LITY'S SAMPLING DE\	/ICE:			ΠY	🗆 n 🗹 na 🗆 ne		
6. SAMPLE R	EPRESENTATIVE OF	VOLUME AND NATUR	E OF DISCHARGE:			ΠY	🗆 n 🗹 na 🗆 ne		
7. SAMPLE S	PLIT WITH PERMITTE	E:				ΠY	🗆 n 🗹 na 🗆 ne		
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			IU ⊠NA ⊡NE		
DETAILS:									
1. SWPPP UF	PDATED AS NEEDED:	DATE OF LAST UP	DATE:			ΠY	□n Øna □ne		
2. SITE MAP I	INCLUDING ALL DISCH	HARGES AND SURFAC	CE WATERS:			ΠY	🗆 n 🗹 na 🗆 ne		
3. POLLUTIO	N PREVENTION TEAM	I IDENTIFIED:				ΠY	🗆 n 🗹 na 🗆 ne		
4. POLLUTION PREVENTION TEAM PROPERLY TRAINED:									
5. LIST OF POTENTIAL POLLUTANT SOURCES:									
6. LIST OF PC	6. LIST OF POTENTIAL SOURCES AND PAST SPILLS AND LEAKS:								
7. ALL NON-S	TORM WATER DISCH	ARGES ARE AUTHOR	IZED:				On Øna One		
8. LIST OF ST	8. LIST OF STRUCTURAL BMPS:								
9. LIST OF NO	ON-STRUCTURAL BMF	PS:				ΠY	🗆 n 🗹 na 🗆 ne		
10. BMPS PRC	PERLY OPERATED A	ND MAINTAINED:				ΠY	□n Øna □ne		
11. INSPECTIO	ONS CONDUCTED AS	REQUIRED:				ΠY	□n Øna □ne		

Inspection Report: Huntsville WWTF, AFIN: 44-00018, Permit #: AR0022004

FLOW CALCULATION SHEET

Date: 2/1	0/2022	Time: 10 :	38			
	0/2022		50			
Head in Inc	hes: 12.6	Feet:	1.05			
			nant Davia			
	e of Primary Fl	ow measurer	nent Device		me	
Name & Mo	odel of Second	lary Flow Mea	asurement	Device:	Greyline	e OCF 5.0
				40/45	10004	
Date of last	Calibration of	Secondary F	IOW Device	: 10/15	2021	
Recorded F	Flow at Date &	Time Listed	Above: 1.	589		(Facility Flow Meter)
	Flow at Date 8			.620		-th
(Flow is calculat	ted using flow charts	s in: <u>ISCO Open C</u>	hannel Flow Me	asurement H	andbook-5	<u>5"' Edition)</u>
% Error =	Recorded Va	alue - Cale	culated Val	ue X 10		
% EII0I =	C	alculated Val	ue		Ū	
	1 620		1 5 9 0			
% Error =	1.620	1.620	1.589	— X 10	0	
		1.020				
% Error =	0.031	X 100				
% EII0I =	1.620	× 100	- X 100			
0/ Error	0.010	X 100				
% Error =	0.019	X 100				
% Error =	1.9	%				
Comments:						

DMR Calculation Check

Reporting Period:	From	2021 Year	12 Month	01 Day	_ To _	2021 Year	<u>12</u> Month	31 Day
Parameter Checked:	Nitrogen, : <u>Nitrate-Nitrite</u>							
	Loading Mass			Concentration Monthly				
	Mo. Avg Ibs/day		Mo. A	Mo. Avg mg/l		7-day Avg	mg/l	
Reported Value:		74.7			7.1		11.1	
Calculated Value:	74.7					11		
Permit Value:	166.8			10			15	

If calculated value does not equal reported value, explain:

Rounding. Unknown for the monthly average.

DMR Calculation Check

Reporting Period:	From	<u>2021</u> Year	12 Month	01 Day	_ To _	2021 Year	<u>12</u> Month	31 Day
Parameter Checked:	Ph	Total osphorus	-					
		Loading Mass			Concentration Monthly			
	Mo.	Mo. Avg Ibs/day			Mo. Avg mg/l 7-day Avg.			mg/l
Reported Value:		10.1			0.9		1.2	
Calculated Value:	10.1			1*			1	
Permit Value:	33.3			2			3	

If calculated value does not equal reported value, explain: <u>Monthly average rounded to 1 from 0.75.</u>





Office of Water Quality Photographic Evidence Sheet	
Location: Huntsville WWTF	
Photographer: Garrett Grimes, District 1 Inspector Date: 2/10/2022	Time: 11:02
Witness:	Photo #: 5
Description: Sludge dryer control panel.	
Is the view of the state of the view of th	
ct Shudge Multi Screw Feeder Temp 319 °F Triskelion Triskelion Tri	
Turbo Dryer Turbo Dryer Runtimes Bottom Temp Material Temp Shelf attain Shelf a	
Advert Advert	
1 1 22 11:02	

From:	Garrett Grimes (adpce.ad)
To:	Uniqika Marshall (adpce.ad)
Subject:	FW: Huntsville Inspection Responses
Date:	Thursday, January 26, 2023 4:50:23 PM
Attachments:	image001.png
	image001.png
	image003.png

Uniqika,

Could you please attach this response to the City of Huntsville's CEI and No-exposure inspections (PDS123787 & 124063).

Thank you,

Garrett Grimes | District 1 Inspector Division of Environmental Quality | Office of Water Quality 5301 Northshore Drive | North Little Rock, AR 72118 c: 501.837.2067 | e : garrrett.grimes@adeq.state.ar.us





From: Sean Davis [mailto:sean.davis@huntsville-water.com] Sent: Wednesday, January 25, 2023 8:40 PM To: Garrett Grimes (adpce.ad) Subject: Re: Huntsville Inspection Responses

See attached. I apologize for forgetting to add them earlier.

On Wed, Jan 25, 2023, 3:01 PM Garrett Grimes (adpce.ad) <<u>Garrett.Grimes@adeq.state.ar.us</u>> wrote:

Sean,

Could you submit photographs of the lid and clarifiers referenced in your response. I do not see these photographs attached.

Thank you,

Garrett Grimes | District 1 Inspector Division of Environmental Quality | Office of Water Quality 5301 Northshore Drive | North Little Rock, AR 72118 c: 501.837.2067 | e : garrrett.grimes@adeq.state.ar.us From: Sean Davis [mailto:<u>sean.davis@huntsville-water.com]</u> Sent: Wednesday, January 25, 2023 1:18 PM To: Garrett Grimes (<u>adpce.ad</u>) Subject: Huntsville Inspection Responses

Garrett,

Attached are the responses I sent regarding last year's inspection.

--Thank you,

Sean Davis Huntsville Water Utilities (479)738-6929 ?











January 30, 2023

Darrell Trahan, Mayor City of Huntsville P.O. Box 430 Huntsville, AR 72740 Via email: <u>mayor@huntsvillear.org</u>; <u>sean.davis@huntsville-water.com</u>

RE: City of Huntsville CEI - Response to Inspection (Madison Co) AFIN: 44-00018 NPDES Permit No.: AR0022004

Honorable Mayor Trahan:

I have reviewed the response pertaining to my Compliance Evaluation Inspection of the City of Huntsville's Wastewater Treatment Facility. The information provided sufficiently addresses the items referenced in my inspection report. At this time, the Division has no further comment concerning this particular inspection. Acceptance of this response by the Division 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) 837-2067 or you may email me at <u>garrett.grimes@adeq.state.ar.us</u>.

Sincerely,

Game Guina

Garrett Grimes Inspector, Office of Water Quality 5301 Northshore Drive, North Little Rock, AR, 72118