



May 4, 2023

Larry Dunaway, Mayor City of Nashville 426 Main Street Nashville, AR 71852

# RE: Nashville WWTP Inspection AFIN: 31-00036 Permit No.: AR0021776

Dear Mayor Dunaway:

On February 9, 2023, I performed a Compliance Evaluation Inspection (CEI) 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 <u>May 18, 2023.</u>

If I can be of any assistance, please contact me at Michael.young@adeq.state.ar.us or 501-837-2073.

Sincerely,

Miller

INSPECTOR NAME Inspector Supervisor, Office of Water Quality 5301 Northshore Drive, North Little Rock, AR, 72118

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and the second	ENVIRONMENTAL	INSPECTION REPORT							
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FACILITY INFORMATION					INSF	PEC	<b>FION INFO</b>	RMATIO	N
NAME: Nashville WWTP					NSPECT	or iD#: 31 S - Stat	e		
743 Highway 27 South				FACILITY EVALUATION RATING: 4 - Satisfactory		Cor	CTION TYPE: <b>mpliance</b>	e Evaluation	
-	shville, AR				( )	TIME: 12			FFECTIVE DATE:
	RESPONSIBLE OFFIC		-				10.02	12/1/	<b>2020</b> XPIRATION DATE:
								11/30	/2025
COMF	rry Dunaway / Mayor				FAYETTEVILLE SI	HAL	E RELATEI		
	y of Nashville				FAYETTEVILLE SI		,		
	NG ADDRESS: 5 Main Street							-	re
	STATE, ZIP:				NAME/TITLE/PHONE/FAX/EMAIL/ET				3
Na	shville AR 71852				Larry Dunaway/M			ator (Lic	
					#005011)/870-845			<b>.</b>	
870 EMAIL	D-845-7400 /				Kevin Funderburk/Pretreatment Coordinator and				
	w@nashar.org				operator				
	INTACTED DURING INSPECTION:	Yes	S		Trey Butler/DEQ Water Inspector Robert Diaz/DEQ Water Inspector				
					LUATIONS			-	
					sfactory, N=Not Applicable/Eva				
Μ	PERMIT	S	FLOW MEAS			S	STORMW		
S	RECORDS/REPORTS	S	LABORATOR			S	FACILITY		
S	OPERATION & MAINTENANCE	S			CEIVING WATER	S			NG PROGRAM
S	SAMPLING	S	SLUDGE HAN	٧D	LING/DISPOSAL	Ν	PRETREA	AIMENT	
**	OTHER:								

## SUMMARY OF FINDINGS

Untreated wastewater was being discharged from the equalization basin to waters of the State (see photos 4-6). This is a violation of the of the Arkansas Water and Air Pollution Control Act - A.C.A. §8-4-217 (b)(1)(E). Please provide a response including a plan of action to prevent future unpermitted discharges.

2.) There is less than two (2) feet of freeboard in the equalization basin (see photos 2-3). This is a violation of the "Ten State Standards" adopted by Regulation 6.202.B of the APC&EC; specifically citation 93.415 of "2014 Recommended Standards for Wastewater Facilities."

#### GENERAL COMMENTS

On February 9, 2023 I performed a Compliance Evaluation Inspection (CEI) at City of Nashville WWTP with the above participants in attendance. City of Nashville WWTP has a treatment design consisting of a bar screen and grit screen followed by an equalization basin, two primary aeration basins ran in parallel, followed by clarification, and disinfection using UV treatment (see Figure 1). After final treatment flow is measured in a Parshall Flume that is monitored with a totalizer and treated water is discharged from Outfall 001 to Mine Creek and thence to Millwood Lake, the Little River, and ultimately segment 1C of the Red River basin. This inspection consisted of a record review and site assessment.

#### **Record Review:**

I was provided sampling information and analysis for December 2022. City of Nashville WWTP contracts with Ana-Lab to analyze Ammonia Nitrogen, Total Phosphorus, Nitrate + Nitrite Nitrogen, and Total Recoverable Cyanide. An internal lab for the City of Nashville WWTP analyzes CBOD5, TSS, Fecal Coliform bacteria, DO and pH. I conducted a DMR check and there were no discrepancies.

#### Site Assessment:

As we started the inspection at the bar screen (see photo 1), I observed that the water levels were very high in all of the ponds at the facility. Larry Dunaway, Mayor and Operator, stated that there had been recent heavy rainfall in the area. I observed that the equalization basin had less than the required two (2) feet of freeboard and we proceeded to walk around the basin (see photos 2-3). At a low water crossing I observed that there was a discharge of untreated sewage going over the low water crossing (see photos 4-5). Another low water crossing on the opposite side of the facility was also discharging untreated sewage (see photo 6). I informed Mr. Dunaway and Kevin Funderburk that the unpermitted discharge needed to be reported to DEQ Enforcement Branch. As I continued to the aeration basins, I observed both to be in good operation with all aerators working (see photos 7-11) with only some small pockets of heavy blanketed sludge on the edges of the aeration basins. Water discharged from the aeration basins was a good color and smell and a grate kept most solids from entering the clarification portion of treatment (see photo 12). Both clarifiers were in good condition with very little accumulations of plastics or other objects (see photos 13-15). Following clarification is the disinfection process which is achieved using UV treatment and I observed that all the components were in good working condition (see photo 16). Flow is measured through a Parshall Flume (see photo 17-18) that is monitored with a totalizer that was in good working condition (see photo 19). A composite sampler is used that is refrigerated and I observed the temperature to be correct (see photo 20). Following UV treatment and flow monitoring is a stair-step post-aeration and samples are collected after post-aeration (see photo 21). Mr. Dunaway stated that flow checks are performed by the facility and provided the most recent calibration information for the totalizer (see photo 22).

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INSPECTOR'S SIGNATURE: Michael Young	DATE: 03/21/2023
SUPERVISOR'S SIGNATURE: Jason Bolenbaugh	DATE: <b>5/2/2023</b>

Inspection Report: Nashville WWTP, AFIN: 31-00036, Permit #: AR	0021776
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:	Øy 🛛 n 🖾 na 🖾 ne
4. ALL DISCHARGES ARE PERMITTED: Unpermitted discharge from equalization basin.	
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:	Øy 🛛 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:	
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:	Øs 🗆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:	🗹 s 🗆 m 🗇 u 🗆 na 🕬 ne
2. TREATMENT UNITS PROPERLY MAINTAINED:	Øs 🗆m 🗇u 🖾na 🖾ne
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED:	Øs 🗆m 🗇u 🗇na 🗇ne
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE:	Øs 🗆m 🗇u 🗇na 🗇ne
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:	
14. HAVE ANT HTDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT. 15. IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT:	
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SECTION D: SAMPLING	
PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS	ØS OM OU ONA ONE
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:	DY DN ØNA DNE
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: TYPE OF DEVICE: Tarshal	
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED:	
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED: <u>Totalizer</u>	
4. CALIBRATION FREQUENCY ADEQUATE:	
5. RECORDS MAINTAINED OF CALIBRATION PROCEDURES:	Øy 🛛 n 🗆 na 🖾 ne
6. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE:	Øy 🛛 n 🗆 na 🖾 ne
7. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE:	Øy ⊡n ⊡na ⊡ne
8. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES:	Øy ⊡n ⊡na ⊡ne
9. HEAD MEASURED AT PROPER LOCATION:	
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) :	
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 <u>&gt;10%</u> OF THE TIME:	
6. SPIKED SAMPLES ARE ANALYZED ≥10% OF THE TIME:	
7. COMMERCIAL LABORATORY USED:	
a. LAB NAME: <u>Ana-Lab</u>	
b. LAB ADDRESS: <u>4270 Viking Drive, Suite A, Bossier City, LA 71111</u>	
c. PARAMETERS PERFORMED: Ammonia, Phosphorus, Nitate-Nitrite Nitrogen, Total Cyanide,	
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 VISUAL OBSERVATIONS ONLY 🗹 S 🗆 M 🗆 U 🗆 NA 🗆 NE								
DETAILS:								
OUTFALL #:	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	COLOR	OTHER	
001	N	N	Ν	N	N	Colorless		
SECTION H: SLUDGE DISPOSAL								
SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS								
DETAILS:								
1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY: Is Im Iu Ina Ine								
2. SLUDGE R	ECORDS MAINTAINE	D AS REQUIRED BY 40	) CFR 503:			⊡s ⊡m		
3. FOR LAND	APPLIED SLUDGE, TY	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			U ⊠NA ⊡NE	
DETAILS:								
1. SAMPLES	OBTAINED THIS INSPI	ECTION:				ΠY	⊡n Øna ⊡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 FACIL	LITY'S SAMPLING DEV	/ICE:			ΠY	□n Øna □ne	
6. SAMPLE R	EPRESENTATIVE OF	VOLUME AND NATUR	E OF DISCHARGE:			ΠY	On Øna One	
7. SAMPLE S	PLIT WITH PERMITTEI	E:				ΠY	□n Øna □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	
	: STORM WAT		-					
	ATER MANAG	EMENT MEET	S PERMIT RE	QUIREMENTS			U ⊠NA ⊡NE	
DETAILS:								
1. SWPPP UP	DATED AS NEEDED:	DATE OF LAST UP	DATE:			ΠY	⊡n Øna ⊡ne	
2. SITE MAP	INCLUDING ALL DISCH	HARGES AND SURFA	CE WATERS:			ΠY	⊡n Øna ⊡ne	
3. POLLUTIO	N PREVENTION TEAM	IDENTIFIED:					⊡n Øna ⊡ne	
4. POLLUTIO	N PREVENTION TEAM	PROPERLY TRAINED					⊡n Øna ⊡ne	
5. LIST OF PC	DTENTIAL POLLUTAN	T SOURCES:				ΠY	□n Øna □ne	
6. LIST OF PC	DTENTIAL SOURCES A	AND PAST SPILLS ANI	D LEAKS:					
7. ALL NON-S	TORM WATER DISCH	ARGES ARE AUTHOR	IZED:					
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	REQUIRED:				ΠY		
1								

## Inspection Report: Nashville WWTP, AFIN: 31-00036, Permit #: AR0021776

# FLOW CALCULATION SHEET

Date: 2/9/2023 Time: 12:47   Head in Inches: 4.44" Feet: 0.37'   Type & Size of Primary Flow Measurement Device: 18" Parshall Flume   Name & Model of Secondary Flow Measurement Device: Totalizer   Date of last Calibration of Secondary Flow Device: Bi-weekly checks   Recorded Flow at Date & Time Listed Above: 589 (Facility Flow Meter)   Calculated Flow at Date & Time Listed Above: 583.6 (Fow is calculated using flow charts in: ISCO Open Channel Flow Measurement Handbook-5th Edition)   % Error = 6 X 100 X 100   % Error = 6 X 100 X 100   % Error = 0.01 X 100 X 100	FLOW CALCOLATION SHEET								
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Name & Model of Secondary Flow Measurement Device: Totalizer   Date of last Calibration of Secondary Flow Device: Bi-weekly checks   Recorded Flow at Date & Time Listed Above: 589 (Facility Flow Meter)   Calculated Flow at Date & Time Listed Above: 583.6 (Flow is calculated using flow charts in: ISCO Open Channel Flow Measurement Handbook-5 <sup>th</sup> Edition)   % Error = Recorded Value - Calculated Value X 100   % Error = 6 X 100 - - -   % Error = 0.01 X 100 - - -	Type & Size of Primary Flow Measurement Device: 18" Parshall Flume								
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$\% \operatorname{Error} = \begin{array}{ c c c } \hline \operatorname{Recorded Value} & - & \operatorname{Calculated Value} \\ \hline \operatorname{Calculated Value} & X 100 \\ \hline \\ \% \operatorname{Error} = \begin{array}{ c c } \hline 589 & - & 583 \\ \hline 583 & X 100 \\ \hline \\ \% \operatorname{Error} = \begin{array}{ c } \hline 6 & \\ 583 & X 100 \\ \hline \\ \% \operatorname{Error} = \begin{array}{ c } \hline 0.01 & X 100 \\ \hline \\ \end{array}$	-			-	<sup>th</sup> Edition)				
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		583							
	% Error =	0.01	X 100						
% Error = <b>1</b> %		0.01	X 100						
	% Error =	1	%						
Comments: Within 10%									

## **DMR Calculation Check**

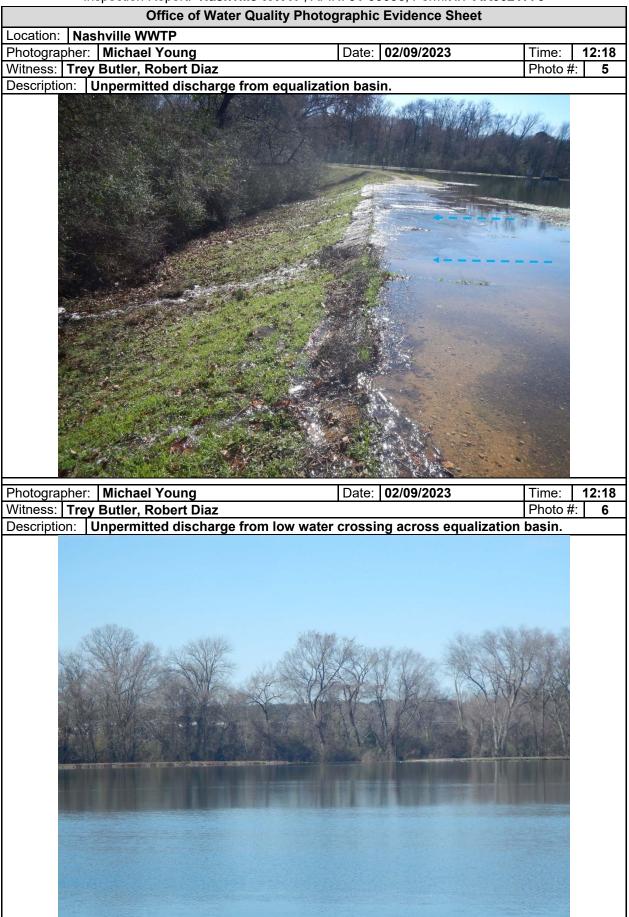
Reporting Period:	From	2022 Year	12 Month	01 Day	_ To _	2022 Year	12 Month	<u>31</u> Day
Parameter Checked:		TSS	-					
		Loading Mass				Concer Mon		
	Mo.	Avg Ibs/o	lay	Mo. A	vg r	ng/l	7-day Avg	mg/l
Reported Value:		206.03			16.9		30.9	7
Calculated Value:		206.03		16.9			30.97	
Permit Value:		437.9			15		22.8	5

If calculated value does not equal reported value, explain:

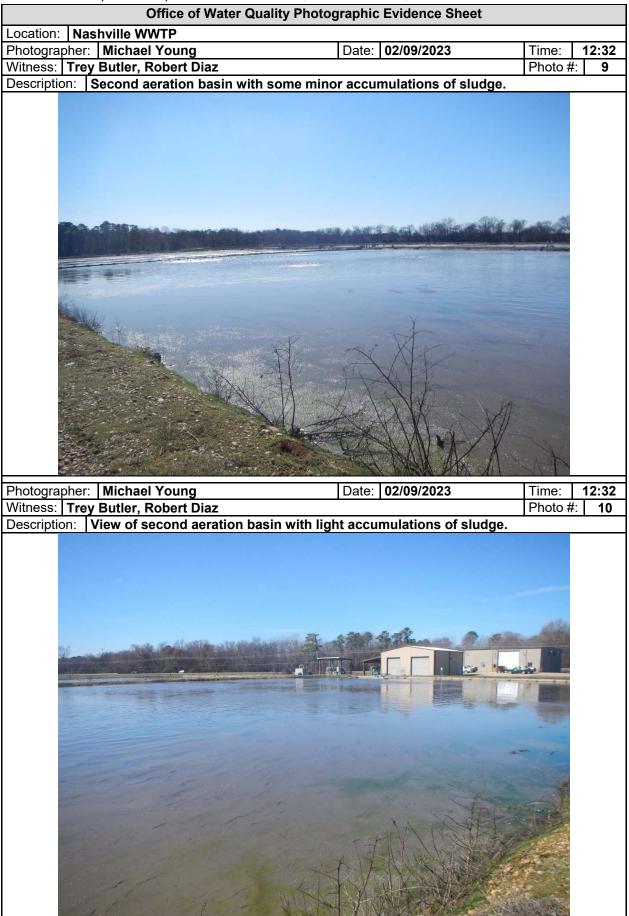
<u>Equal</u>



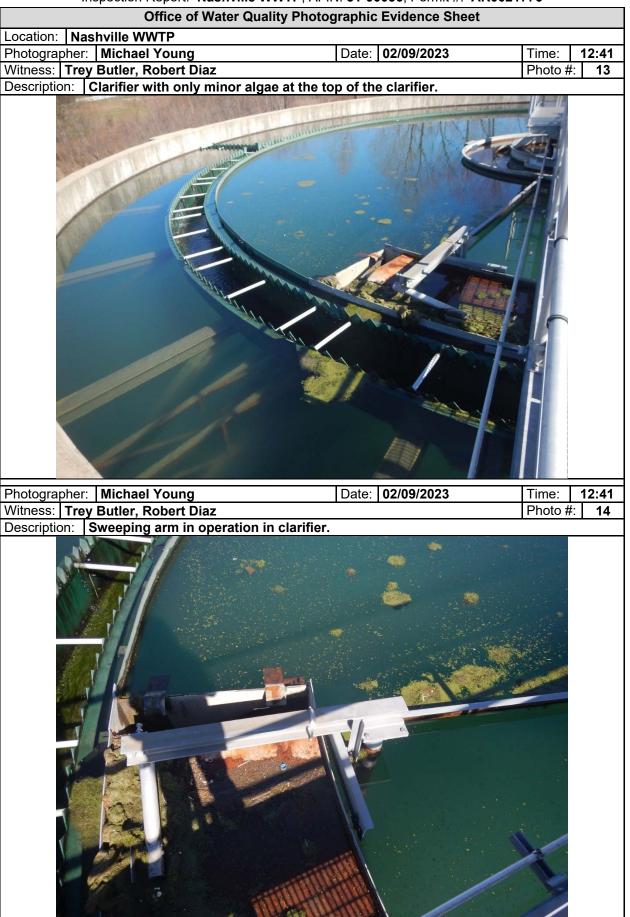


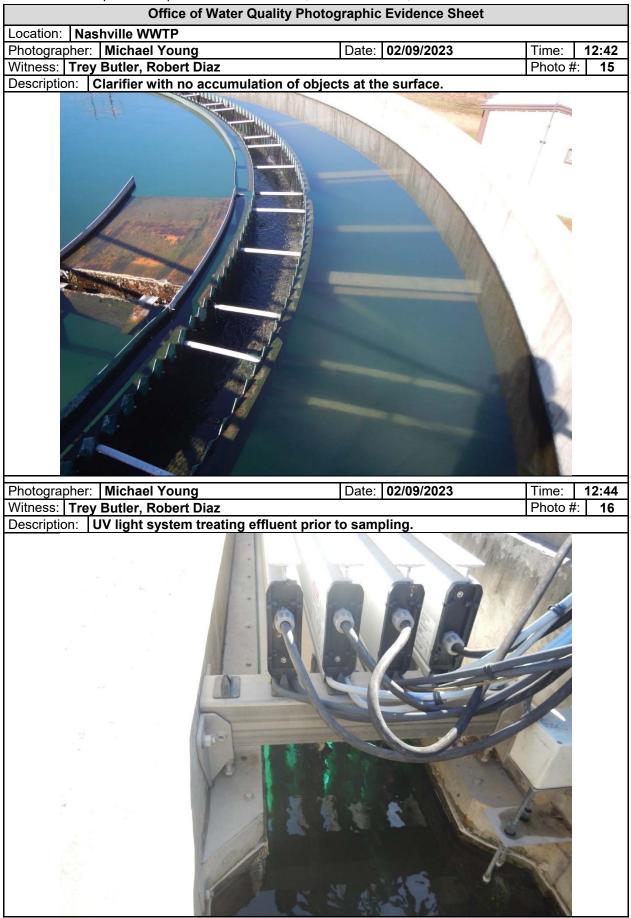


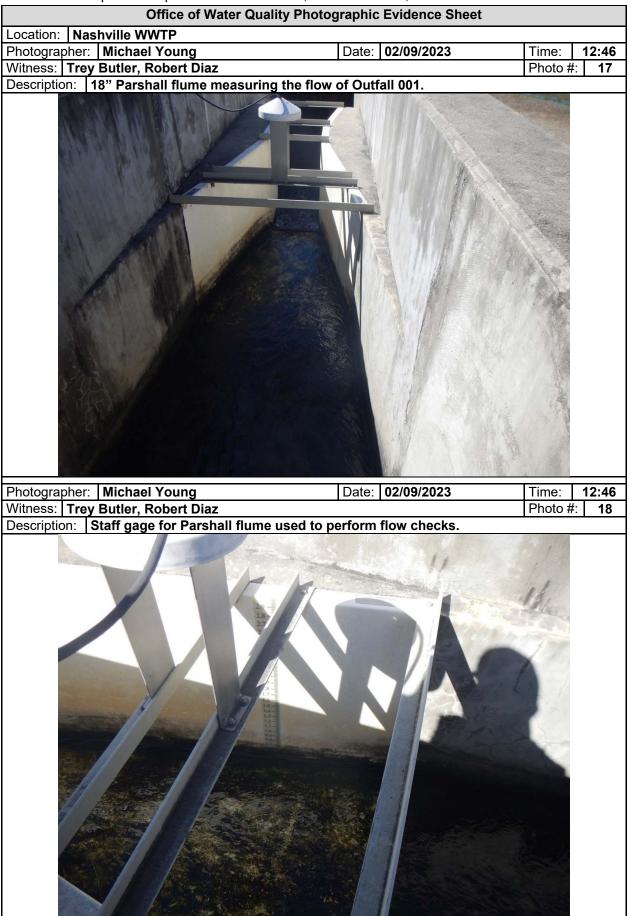
	Office of Water Quality P	hotographic Evidence Sheet	
Location:			
Photogra	pher: Michael Young	Date: 02/09/2023	Time: 12:31
	Trey Butler, Robert Diaz	1	Photo #: 7
Descripti	on: Aeration basin with activated sluc	lge.	
		Man Hits and States agen	Man All
		A management of the second	
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		A supervision of the second second	
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	a second and a second		
Photogra Witnoss:		Date: 02/09/2023	Time: <b>12:31</b>
Witness:	Trey Butler, Robert Diaz		Photo #: 8
	Trey Butler, Robert Diaz		Photo #: 8
Witness:	Trey Butler, Robert Diaz		Photo #: 8
Witness:	Trey Butler, Robert Diaz		Photo #: 8
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Witness:	Trey Butler, Robert Diaz		Photo #: 8
Witness:	Trey Butler, Robert Diaz		Photo #: 8













Office of Water Quality Photographic Evidence Sheet					
Location: Nashville WWTP					
Photographer: Michael Young	Date: 02/09/2023	Time: 12:50			
Witness: Trey Butler, Robert Diaz Description: Step-aeration followin	g flow measurements and location of sampl	Photo #: 21			
Photographer: Michael Young	Date: 02/09/2023	Time: 12:51			
Witness: Trey Butler, Robert Diaz		Photo #: 22			
Description: Calibration informatio	n for totalizer.				

## Inspection Report: **Nashville WWTP**, AFIN: **31-00036**, Permit #: **AR0021776** Figure 1. Overview of the City of Nashville WWTP with treatment components identified.

