

# ADEQ

ARKANSAS  
Department of Environmental Quality

June 10, 2011

Coy Dale  
Water/Wastewater Superintendent  
City of Melbourne  
P.O. Box 800  
Melbourne, AR 72556

RE: AFIN: 33-00026; Permit No.: AR0020036

Dear Mr. Dale:

The 2010 Annual Sludge Report as required by the referenced permit was received on April 19, 2011. In accordance with Department policy, your report has been reviewed and determined to be incomplete. Please correct the following deficiencies within twenty-one (21) days of this letter:

1. The Sludge Analyses dated 4/7/2010, 5/25/2010, 8/25/2010, and 12/29/2010 were not tested for Molybdenum as required by Part II Condition 11.14.
2. The Sludge Analyses dated 4/7/2010, 8/25/2010, and 12/29/2010 were not tested for Polychlorinated Biphenyls (PCBs) as required by Part II Condition 11.14.
3. Multiple soil sample analyses from multiple laboratories were submitted. The submitted soils analyses did not denote which fields the samples represent. Please denote which field each analysis represents. The Field Identifications need to match those found in Part II Condition 11.3 of your permit.
4. In review of your pathogen and vector reduction certification, it was discovered that the certification refers to sections of 40 CFR 503 that do not apply to this certification. Please review 40 CFR 503.17 and revise the certification letter.
5. Part II Condition 11.15 requires the submittal of the quantities of biosolids applied in dry tons per acre per year and gallons per acre per year as well as the total elements applied to date. Please submit this information.
6. The Laboratory Calculation Worksheets provided are incorrect. Please revise the worksheet to address the following issues:
  - a. The Plant Available Nitrogen (PAN) calculation is incorrect. The PAN equation to be used is stated in Part II Condition 2 of your permit. The PAN equation requires Nitrite (NO<sub>2</sub>) be included in the PAN calculation.
  - b. The calculation to determine the Dry Tons of Biosolids Applied used the Percent Volatile Solids. This is incorrect. The correct parameter to use to determine dry tons is Percent Total Solids.
  - c. Since the Dry Tons Applied is incorrect, the Pounds Applied and Pounds per Acre calculations are incorrect and need to be revised.

7. Please revise the cover letter to include the increased amount of biosolids land applied. Also, the permit includes 150 acres of permitted land application area.
8. The report included sludge analyses from 4/7/2010, 5/25/2010, 8/25/2010, and 12/29/2010. The land application logs shows all land application taking place between 5/12/2010 and 6/3/2010. Did any other land application take place?

Thank you for your cooperation in this matter. If there are any questions concerning this submittal, please contact me at (501) 682-0651 or by email at [hogan@adeq.state.ar.us](mailto:hogan@adeq.state.ar.us).

Sincerely,

A handwritten signature in blue ink, appearing to read 'S. Hogan', with a long horizontal flourish extending to the right.

Stephen Hogan  
Engineer  
Permits Branch, Water Division

cc: Eric Fleming, Inspections Branch Manager, Water Division  
Cindy Garner, Enforcement Branch Manager, Water Division