



May 27, 2011

Mr. Larry Bowen, Mayor  
City of Tuckerman Water Treatment Plant  
P.O. Box 1117  
Tuckerman, AR 72473

RE: Compliance Inspection

AFIN: 34-00399                      NPDES Permit No.: ARG640081

Dear Mr. Bowen:

On April 25, 2011, I performed a routine compliance inspection of the water treatment 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. This inspection revealed that your facility was out of compliance with the permit. Specifically, I found the following violations:

1. After reviewing Monthly Flow Sheets for January, February and March, 2011 it was determined that flow readings were not being recorded 5 times per week as required in the permit. Part I, Section B, Effluent Limitations and Monitoring Requirements, of the permit.
2. The facility Settlement Pond was full of sediment in the containment area and water was observed flowing over the top of the containment area on the west side of the pond. The water was flowing into a branch that flows into Tuckerman Ditch approx. 60-75 feet east of the permitted outlet. This is considered an unpermitted discharge. This is a violation of the Arkansas Water and Air Pollution Control Act (8-4-217) b, 1.
3. The Settlement Pond full of sediment and weeds in the pond is also considered improper operation and maintenance of systems of treatment and control to achieve compliance with conditions of the permit. This is a violation of Part II, Section B, Item 1, a, of the permit.

The above items require your immediate attention. Please submit a written response to these findings to Cindy Garner, Water Division Enforcement Branch Manager, of this Department. This response should be mailed to the address below. 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 documentation (i.e. pictures) is due by June 6, 2011.

Larry Bowen  
City of Tuckerman  
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For additional information you may contact the enforcement branch by telephone at 501-682-0639 or by fax at 501-682-0910.

If I can be of any assistance, feel free to contact me at 870-793-5819.

Sincerely,

A handwritten signature in black ink that reads "Mike Kennedy". The signature is written in a cursive, slightly slanted style.

Mike Kennedy  
District 11  
Water Division

cc: Water Division Enforcement Branch  
Water Division Permits Branch



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Washington, D.C. 20460

# NPDES Compliance Inspection Report

Form Approved  
OMB No. 2040-0003

## Section A: National Data System Coding

Transaction Code			NPDES								Yr/Mo/Day					Inspec. Type		Inspector		Fac. Type											
1	N	2	5	3	A	R	G	6	4	0	0	8	1	11	12	1	1	0	4	2	5	17	18	C	19	S	20	1			
Remarks																															
A F I N 3 4 - 0 0 3 9 9																															
Inspection Work Days						Facility Evaluation Rating						BI		QA		-----Reserved-----															
67						70						71		72		73		74		75		76		77		78		79		80	

## Section B: Facility Data

Name and Location of Facility Inspected (*For industrial users discharging to POTW, also include POTW name and NPDES permit number*)

**City of Tuckerman WTP**  
**305 Highway #67 South**  
**Tuckerman, AR 72473 (Jackson County)**

Entry Time/Date  
**1200 / 4-25-11**

Permit Effective Date  
**April 1, 2006**

Exit Time/Date  
**1430 / 4-25-11**

Permit Expiration Date  
**July 31, 2011**

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)  
**Terry Geaslin / Plant Operator / Cell 870-624-0073**

Other Facility Data  
**N35°43'39.239"**  
**W91°12'02.412"**

Name, Address of Responsible Official/Title/Phone and Fax Number  
**Terry Geaslin / Plant Operator / Cell 870-624-0073**  
**P.O. Box 1068**  
**Tuckerman, AR 72473**

Contacted  
Yes ☒ No ☐

## Section C: Areas Evaluated During Inspection

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

S	Permit	S	Flow Measurement	U	Operations & Maintenance	U	Sampling
S	Records/Reports	U	Self-Monitoring Program	S	Sludge Handling/Disposal	N	Pollution Prevention
U	Facility Site Review	S	Compliance Schedules	N	Pretreatment	N	Multimedia
S	Effluent/Receiving Waters	S	Laboratory	N	Storm Water	N	Other:

## Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

The Quarterly Discharge Monitoring Report for October, November and December 2010, the last quarter of 2010 was reviewed during the inspection.

- After reviewing Monthly Flow Sheets for January, February and March, 2011 it was revealed that flow readings were not being recorded 5 times per week as required in the permit. Part I, Section B, Effluent Limitations and Monitoring Requirements, of the permit.
- The facility Settlement Pond was full of sediment in the containment area and water was observed flowing over the top of the containment area on the west side of the pond. The water was flowing into a branch that flows into Tuckerman Ditch approx. 60-75 feet east of the permitted outlet. This is a violation of the Arkansas Water and Air Pollution Control Act (8-4-217) b, 1.
- The Settlement Pond full of sediment and weeds in the pond is also improper operation and maintenance of treatment and control systems to achieve compliance with the conditions of the permit. This is a violation of Part II, Section B, Item 1, a, of the permit.

Name(s) and Signature(s) of Inspector(s)

*Mike Kennedy*  
Mike Kennedy

Agency/Office/Telephone/Fax  
AR Dept. of Environmental Quality-Batesville  
870-793-5819 / Fax 870-793-5814

Date  
May 20, 2011

Signature of Reviewer

Agency/Office/Phone and Fax Numbers

Date

**SECTION A: PERMIT VERIFICATION**

PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS

☒S ☐M ☐U ☐NA ☐NE

## DETAILS:

- |  |  |
|--|--|
| 1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE:                            | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE            |
| 2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES: | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE |
| 3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT:           | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 4. ALL DISCHARGES ARE PERMITTED:   | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |

**SECTION B: RECORDKEEPING AND REPORTING EVALUATION**

RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT

☒S ☐M ☐U ☐NA ☐NE

## DETAILS:

- |  |   |
|--|---|
| 1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS:                         | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE                            |
| 2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE:                                  | <input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE |
| a. DATES AND TIME(S) OF SAMPLING:  | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE                            |
| b. EXACT LOCATION(S) OF SAMPLING:  | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE                            |
| c. NAME OF INDIVIDUAL PERFORMING SAMPLING:   | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE                            |
| d. ANALYTICAL METHODS AND TECHNIQUES:  | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE                            |
| e. RESULTS OF CALIBRATIONS:  | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE                            |
| f. RESULTS OF ANALYSES:  | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE                            |
| g. DATES AND TIMES OF ANALYSES:  | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE                            |
| h. NAME OF PERSON(S) PERFORMING ANALYSES:  | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE                            |
| 3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE:                | <input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR:       | <input type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE |
| 5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE                            |

**SECTION C: OPERATIONS AND MAINTENANCE**

TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED

☐S ☐M ☒U ☐NA ☐NE

## DETAILS:

- |   |   |
|---|---|
| 1. TREATMENT UNITS PROPERLY OPERATED:   | <input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 2. TREATMENT UNITS PROPERLY MAINTAINED: <u>(Settlement Pond full and overflowing not flowing through permitted outlet 101, also too much vegetation in settlement pond)</u> | <input type="checkbox"/> S <input type="checkbox"/> M <input checked="" type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED: <u>(Generator)</u>   | <input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE: <u>(Lights on pump stations)</u>  | <input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 5. ALL NEEDED TREATMENT UNITS IN SERVICE:   | <input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED: <u>(1-Water Treatment License D-4 &amp; T-4)</u>  | <input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED:   | <input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 8. OPERATION AND MAINTENANCE MANUAL AVAILABLE:  | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE                            |
| 9. STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED:   | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE                            |
| 10. PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED:   | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE                            |
| 11. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR:   | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE                            |
| 12. IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED:   | <input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE                            |
| 13. HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS:  | <input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE                            |
| 14. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT:   | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE                            |
| 15. IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT:   | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE                            |

**SECTION D: SAMPLING****PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS**☐S ☐M ☒U ☐NA ☐NE**DETAILS:**

- |  |  |
|--|--|
| 1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT:   | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES:  | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT:   | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE |
| 4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT:  | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT: <u>(Not recording flow readings 5 times per week as required in the permit)</u> | <input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 6. SAMPLE COLLECTION PROCEDURES ADEQUATE:  | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| a. SAMPLES REFRIGERATED DURING COMPOSITING:  | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE |
| b. PROPER PRESERVATION TECHNIQUES USED:  | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| c. CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136:  | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 7. IF MONITORING IS PERFORMED MORE OFTEN THAN REQUIRED ARE RESULTS REPORTED ON THE DMR:  | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> 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:___ TYPE OF DEVICE: <u>(Totalizer Meter)</u> | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED:   | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED:                          | <input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 4. CALIBRATION FREQUENCY ADEQUATE:  | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE |
| 5. RECORDS MAINTAINED OF CALIBRATION PROCEDURES:  | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE |
| 6. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE:  | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE |
| 7. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE:                               | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 8. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES:                                    | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 9. HEAD MEASURED AT PROPER LOCATION:  | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |

**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) : | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED:          | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE |
| 3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT:                     | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 4. QUALITY CONTROL PROCEDURES ADEQUATE:   | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 5. DUPLICATE SAMPLES ARE ANALYZED $\geq 10\%$ OF THE TIME:                                    | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 6. SPIKED SAMPLES ARE ANALYZED $\geq 10\%$ OF THE TIME:                                       | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 7. COMMERCIAL LABORATORY USED:___ (Yes)   | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| a. LAB NAME: <b>Arkansas Testing Laboratories</b>   |  |
| b. LAB ADDRESS: <b>204 East Lincoln Street, Searcy, AR. Phone:501-268-9314</b>                |  |
| c. PARAMETERS PERFORMED: <b>(TSS, pH, &amp; Total Residual Chlorine)</b>                      |  |
| 8. BIOMONITORING PROCEDURES ADEQUATE:   | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE |
| a. PROPER ORGANISMS USED:   | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE |
| b. PROPER DILUTION SERIES FOLLOWED:   | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE |
| c. PROPER TEST METHODS AND DURATION:  | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE |
| d. RETESTS AND/OR TRE PERFORMED AS REQUIRED:  | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE |

**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
101	None	None	None	None	None	Clear	N/A

**SECTION H: SLUDGE DISPOSAL**

SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS

☐S ☐M ☐U ☒NA ☐NE

DETAILS:\_(No sludge disposed in Fiscal Year 2010)

- |   |   |
|---|---|
| 1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY:   | <input type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE |
| 2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503:   | <input type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE |
| 3. FOR LAND APPLIED SLUDGE, TYPE OF LAND APPLIED TO: (E.G., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE): |   |

**SECTION I: SAMPLING INSPECTION PROCEDURES**

SAMPLE RESULTS WITHIN PERMIT REQUIREMENTS

☐S ☐M ☐U ☒NA ☐NE

DETAILS:

- |  |  |
|--|--|
| 1. SAMPLES OBTAINED THIS INSPECTION:   | <input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 2. TYPE OF SAMPLE: <input type="checkbox"/> GRAB:___ <input type="checkbox"/> COMPOSITE:___ METHOD:___ FREQUENCY:___ |  |
| 3. SAMPLES PRESERVED:  | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE |
| 4. FLOW PROPORTIONED SAMPLES OBTAINED:   | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE |
| 5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE:  | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE |
| 6. SAMPLE REPRESENTATIVE OF VOLUME AND NATURE OF DISCHARGE:  | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE |
| 7. SAMPLE SPLIT WITH PERMITTEE:  | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE |
| 8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED:   | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE |
| 9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT:  | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE |

**SECTION J: STORM WATER POLLUTION PREVENTION PLAN**

STORM WATER MANAGEMENT MEETS PERMIT REQUIREMENTS

☐S ☐M ☐U ☒NA ☐NE

DETAILS:

- |  |  |
|--|--|
| 1. SWPPP UPDATED AS NEEDED:___ DATE OF LAST UPDATE:___   | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE |
| 2. SITE MAP INCLUDING ALL DISCHARGES AND SURFACE WATERS: | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE |
| 3. POLLUTION PREVENTION TEAM IDENTIFIED:                 | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE |
| 4. POLLUTION PREVENTION TEAM PROPERLY TRAINED:           | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE |
| 5. LIST OF POTENTIAL POLLUTANT SOURCES:                  | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE |
| 6. LIST OF POTENTIAL SOURCES AND PAST SPILLS AND LEAKS:  | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE |
| 7. ALL NON-STORM WATER DISCHARGES ARE AUTHORIZED:        | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE |
| 8. LIST OF STRUCTURAL BMPS:                              | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE |
| 9. LIST OF NON-STRUCTURAL BMPS:                          | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE |
| 10. BMPS PROPERLY OPERATED AND MAINTAINED:               | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE |
| 11. INSPECTIONS CONDUCTED AS REQUIRED:                   | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE |

## FLOW CALCULATION SHEET

Date: **4-25-11** Time: **1330**Head in Inches: **N/A** Feet: **N/A**

Type &amp; Size of Primary Flow Measurement Device: Totalizer Meter

Name & Model of Secondary Flow Measurement Device: **No Secondary Flow Measurement Device**Date of last Calibration of Secondary Flow Device: **N/A**

Recorded Flow at Date &amp; Time Listed Above: (Facility Flow Meter)

Calculated Flow at Date & Time Listed Above:  
(Flow is calculated using flow charts in: ISCO Open Channel Flow Measurement Handbook-5<sup>th</sup> Edition)

% Error =		-		X 100	

% Error =		-		X 100	

% Error =		X 100	

% Error =		X 100	

% Error =		%	

Comments:

### DMR Calculation Check

(001)

**Reporting Period:** From 10 10 01 To 10 12 31  
Year Month Day Year Month Day

**Parameter Checked:** TSS

**Loading  
Mass**

Mo. Avg. - lbs/day

**Concentration  
Monthly**

Mo. Avg. - mg/l

7-day Avg. - mg/l

**Reported Value:** N/A 7 7

**Calculated Value:** N/A 7 7

**Permit Value:** N/A 20 30

**If calculated value does not equal reported value, explain:** Only one sample taken per quarter.



### Additional Comments

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Section D

Item 5 : After reviewing Monthly Flow Sheets for January, February and March, 2011 it was revealed that flow readings were not being recorded 5 times per week as required in the permit. This is a violation of Part I, Section B, Effluent Limitations and Monitoring Requirements, of the permit.

The facility Settlement Pond was full of sediment in the containment area and water was observed flowing over the top of the containment area on the west side of the pond. The water was flowing into a branch that flows into Tuckerman Ditch approx. 60-75 feet east of the permitted outlet. This is a violation of the Arkansas Water and Air Pollution Control Act (8-4-217) b, 1.

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Section C

Item 2 : The settlement pond full of sediment and weeds in the pond is also considered improper operation and maintenance of systems of treatment and control to achieve compliance with conditions of the permit. This is a violation of Part II, Section B, Item 1, a, of the permit.

Water Division NPDES Photographic Evidence Sheet							
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<b>Location:</b>	305 Highway #67 South in Tuckerman (Jackson County)						
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<b>Photographer:</b>	Mike Kennedy			<b>Witness:</b>	Terry Geaslin		
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<b>Photo #</b>	1	<b>Of</b>	7	<b>Date:</b>	4-25-11	<b>Time:</b>	1317
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<b>Description:</b>	A view of the settlement pond looking from west to east. Note pond full of sediment and weeds in pond.
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<b>Photographer:</b>	Mike Kennedy			<b>Witness:</b>	Terry Geaslin		
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<b>Photo #</b>	2	<b>Of</b>	7	<b>Date:</b>	4-25-11	<b>Time:</b>	1318
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<b>Description:</b>	A closer view of the pond showing no more capacity for containment in the pond and the weeds on the east side.
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Water Division NPDES Photographic Evidence Sheet							
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<b>Location:</b>	305 Highway #67 South in Tuckerman (Jackson County)						
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<b>Photographer:</b>	Mike Kennedy			<b>Witness:</b>	Terry Geaslin		
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<b>Photo #</b>	3	<b>Of</b>	7	<b>Date:</b>	4-25-11	<b>Time:</b>	1324
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<b>Description:</b>	This view shows water overflowing the containment area along the west side, which is an unpermitted discharge.						
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<b>Photographer:</b>	Mike Kennedy			<b>Witness:</b>	Terry Geaslin		
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<b>Photo #</b>	4	<b>Of</b>	7	<b>Date:</b>	4-25-11	<b>Time:</b>	1324
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<b>Description:</b>	This view shows the water flowing around the containment area to the east.						
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Water Division NPDES Photographic Evidence Sheet							
<b>Location:</b>	305 Highway #67 South in Tuckerman (Jackson County)						
<b>Photographer:</b>	Mike Kennedy				<b>Witness:</b>	Terry Geaslin	
<b>Photo #</b>	5	<b>Of</b>	7		<b>Date:</b>	4-25-11	<b>Time:</b> 1324
<b>Description:</b>	This view shows water farther east flowing toward a branch flowing from north to south that eventually flows into Tuckerman Ditch.						
							
<b>Photographer:</b>	Mike Kennedy				<b>Witness:</b>	Terry Geaslin	
<b>Photo #</b>	6	<b>Of</b>	7		<b>Date:</b>	4-25-11	<b>Time:</b> 1324
<b>Description:</b>	The settlement pond water flowed into this ditch that flows to Tuckerman Ditch.						
							

ADEQ Water NPDES Inspection	34-00399	Permit #: ARG640081
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Water Division NPDES Photographic Evidence Sheet							
<b>Location:</b>	305 Highway #67 South in Tuckerman (Jackson County)						
<b>Photographer:</b>	Mike Kennedy				<b>Witness:</b>	Terry Geaslin	
<b>Photo #</b>	7	<b>Of</b>	7		<b>Date:</b>	4-25-11	<b>Time:</b> 1324
<b>Description:</b>	This view looking east shows Tuckerman Ditch. The outlet for the settlement pond is located approx. 60-75 feet back west from where the branch flows into the ditch flowing west to east.						
							





July 6, 2011

City Of Tuckerman Water Treatment Plant  
Attention: Honorable Larry Bowen  
P.O. Box 1117  
Tuckerman, AR 72473

Re: NPDES Permit ARG640081, AFIN 34-00399  
Failure to Respond

Dear Mayor Bowen:

On April 24, 2011 Mike Kennedy, District Field Inspector, Water Division performed a routine compliance inspection of your facility. The Inspector sent you a letter (copy enclosed) informing you of the results of the inspection and requesting a written response by June 6, 2011. An extension was granted to June 17, 2011. As of the date of this letter, the response has not been received. Please submit the required response to the inspection to the Water Enforcement Branch by **July 15, 2011.**

Please be advised that a continuing lack of cooperation in this matter may result in formal enforcement action. Such action would include but would not be limited to the assessment of monetary penalties.

Thank you for your attention to this matter. Should you have any questions, feel free to call 501-682-0631 or e-mail [meints@adeq.state.ar.us](mailto:meints@adeq.state.ar.us).

Sincerely,

A handwritten signature in blue ink that reads "Rene E. Meints".

Rene` E. Meints  
Enforcement Analyst  
Water Division Enforcement Section



July 7, 2011

Ms. Rene Meints  
Enforcement Analyst  
ADEQ Water Division  
5301 Northshore Drive  
North Little Rock, Arkansas 72118

RE: NPDES Permit # ARG640081  
AFIN Number 34-00399  
City of Tuckerman Water Treatment Plant  
City of Tuckerman, Arkansas

Dear Rene,

In regards to the April 25, 2011 Inspection Report by Inspector Mike Kennedy, the following responses are in accordance to the items in his letter:

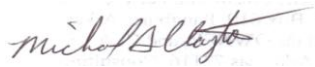
1. After reviewing the permit and discussing with the Mayor, the Operator will comply with the requirement to perform daily readings for the flow and record it at least five (5) times per week.
2. The water in the Settlement Pond is full of sediment and has been overflowing for the quite often during April and May. The issue was a major line blockage between the clarifier and the carbonation basin in the 14" ductile iron pipe and 14" butterfly valve causing water to overflow the clarifier discharge directly to the Settlement Pond. The raw water was being lost due to the blockage and overloading the Settlement Pond. A Contractor, Carl Baldwin Construction, was hired to replace the piping and facilities between the Clarifier and the Carbonation basin. After waiting for nearly three weeks for the replacement materials to be shipped from Houston and Atlanta such as the 14" flanged butterfly valve along with additional fittings to arrive, the Contractor was able to replace the butterfly valve and associated fittings that were clogged up from Caustic Soda buildup over the years of operations. During Memorial Day weekend, May 30, 2011, the City was able to borrow a high capacity pump from a Contractor and purchased two additional pumps to by-pass the clogged line between the Clarifier to the Filters which stopped the water from overflowing the Clarifier to the Settlement Pond. The Contractor was very successful replacing the valve and fittings between the Clarifier and the Carbonation basin on June 17, 2011. The existing blockage was approximately 85 to 90%. Furthermore, the Contractor was hired to continue with the task of improving the hydraulic capacity of the existing 14" line from the Carbonation basin the the Sand Filters. On June 23, 2011 the 14" butterfly valve and 14" Ductile Iron Pipe was removed and cleaned to open up the flow.

Finally, on June 29, 2011, the Operator was able to remove two 8" valves at the Sand Filters pipe gallery and remove the blockage to restore the fully design hydraulic capacity of the water flowing from the Clarifier to the Sand Filters. The unpermitted discharge was due to the blockage of the water lines in the Water Treatment Plant from buildup over the years of use and has been addressed.

3. The City will remove the sediment buildup including weeds and other vegetation within the next 45 days or no later than August 22, 2011. Also, the City will be applying for a Land Application Renewal Permit within the next 60 days for a long-term solution of sediment removal. The Operator will maintain the Settlement Pond in compliance of the Permit.

If you have any questions regarding this matter, please contact me at (501) 753-5200. Thank you for your cooperation and assistance.

Sincerely,

A handwritten signature in dark ink, appearing to read "Michael Clayton". The signature is fluid and cursive, with the first name "Michael" and last name "Clayton" clearly distinguishable.

Michael Clayton, P.E.

cc: Mayor Larry Bowen, City of Tuckerman





New silt fencing to replace failing silt fencing on east side along Hwy. 107.



Hay Bales have been removed as a velocity dissipater.





July 8, 2011

City of Tuckerman, WWTP  
Attention: Honorable Larry Bowen  
P.O. Box 1117  
Tuckerman, AR 72473

RE: NPDES Permit Number ARG640081, AFIN 34-00399  
Inspection Response

Dear Mayor Bowen:

The Department has received your response to the April 24, 2011 inspection of your facility by our District Field Inspector, Mike Kennedy. The information submitted sufficiently addresses the concerns of the Department. The Department expects the corrective actions taken will be maintained to ensure consistent compliance with the requirements of the permit. Acceptance of this response by the Department does not preclude any future enforcement action deemed necessary at this site or any other site.

Reminder: When sediment and weeds have been removed from the pond, please submit pictures depicting the correction. Send information to:

ADEQ, Water Division Enforcement Branch  
Attention: René Meints  
5301 Northshore Drive  
North Little Rock, AR 72118-5317

The Department will keep the inspection and response on file. If future violations occur that require enforcement action, the Department will consider the inspection and response as required by the Pollution Control and Ecology Commission Regulation No. 7, Civil Penalties. This regulation requires the Department to consider the past history of your site and how expeditiously the violations were addressed in determining any civil penalty that may be necessary for any future violations.

If we need further information concerning this matter, we will contact you. Thank you for your attention to this matter. If you have any questions, please call 501-682-0631 or e-mail [meints@adeq.state.ar.us](mailto:meints@adeq.state.ar.us).

Honorable Larry Bowen

Page 2

July 08, 2011

Sincerely,

A handwritten signature in blue ink that reads "René E. Meints". The signature is written in a cursive style with a small dot over the 'e' in "Meints".

René E. Meints  
Enforcement Analyst  
Water Division Enforcement Branch

cc: Michael Clayton, Engineer