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STATE OF ARKANSAS  
DEPARTMENT OF POLLUTION CONTROL AND ECOLOGY

8001 NATIONAL DRIVE, P.O. BOX 8913  
LITTLE ROCK, ARKANSAS 72219-8913  
PHONE: (501) 682-0656  
FAX: (501) 682-0910



November 3, 1997

Mr. Wyman Morgan, General Manager  
City of West Memphis Water Utilities  
P.O. Box 1868  
West Memphis, Arkansas 72301

RECEIVED  
NOV 13 1997  
2414  
315

Re: CSN: 18-0019; NPDES Permit No.: AR0022039

Dear Mr. Morgan:

On October 28, 1997, I performed a routine compliance inspection of the City of West Memphis's wastewater 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 the following violations:

- DMR's for the months of January, February, and March 1997 were reviewed. The following effluent excursions were observed during this time period:
  - February 1997 - BOD, mass loading  
TSS, mass loading and 7-day avg.
  - March 1997 - BOD, mass loading  
TSS, mass loading, 30-day avg., and 7-day avg.
- Periods of Hydraulic overload to the treatment system occurred due to I & I problems in the collection system.

The above items require your immediate attention. Please submit a written response to these findings to the NPDES Enforcement Section of this Department when the violations have been corrected. 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 is due by December 5, 1997.

If I can be any assistance, please contact me at 870-673-8846.

Sincerely,

*Sam Clardy*  
Sam Clardy  
District Field Inspector  
Water Division  
EDW  
cc: NPDES Branch

NPDES COMPLIANCE FILES  
NPDES # 22039 *Lipson*  
\_\_\_\_ DMR'S *added*  
\_\_\_\_ NCR  
 CORRESPONDENCE  
\_\_\_\_ CRAS



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

# NPDES Compliance Inspection Report

Major Mump

Form Approved  
OMB No. 2040-0003  
Approval Expires 7-31-85

## Section A: National Data System Coding

Transaction Code			NPDES									yr/mo/day						Inspec. Type		Inspector		Fac Type					
N	2	5	3	A	R	0	0	2	2	0	3	9	11	12	9	7	1	0	2	8	17	18	C	19	S	20	1
Remarks																											
C S N 1 8 - 0 0 1 9 i n C r i t t e n d e n C o .																											
Inspection Work Days						Facility Evaluation Rating						BI		QA		Reserved											
67						70						71		72		73 74 75											

## Section B: Facility Data

<b>Name and Location of Facility Inspected</b> (For industrial users discharging to POTW, also include POTW name and NPDES permit number) City Of West Memphis 502 Rushing Road West Memphis, Arkansas in Crittenden County	<b>Entry Time /Date</b> 0900 / October 28, 1997	<b>Permit Effective Date</b> September 1, 1990
	<b>Exit Time/Date</b> 1230 / October 28, 1997	<b>Permit Expiration Date</b> August 31, 1995
<b>Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)</b> Mike Moudy, Project Manager (OMI), 870-735-9862 John Newson, Jr., Collection System Manager, 870-735-3355	<b>Other Facility Data</b> — N/A —	
<b>Name, Address of Responsible Official/Title/Phone and Fax Number</b> Wyman Morgan, General Manager of Water Utilities, 870-735-3355 P.O. Box 1868 West Memphis, Arkansas 72301	<b>Contacted</b> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	

## Section C: Areas Evaluated During Inspection

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

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

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

- DMR's for the months of January, February, and March 1997 were reviewed. The following effluent excursions were observed during this time period:  
 February 1997 - BOD, mass loading  
 TSS, mass loading and 7-day average  
 March 1997 - BOD, mass loading  
 TSS, mass loading, 30-day average, and 7-day average
- The facility experiences periods of hydraulic overload to their treatment system due to I & I problems in the collection system. The I & I problems have caused the facility to by-pass at times. These by-passes have been reported to the Department as required by their NPDES permit.
- The facility has installed a new flow meter, which is hooked up to their composite sampler.

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Telephone/Fax	Date
Sam Clardy	ADPC&E / Stuttgart, AR	Nov. 3, 1997
Sam Clardy	870-673-8846	
Signature of Management QA Reviewer	Agency/Office/Phone and Fax Numbers	Date

**SECTION A - PERMIT VERIFICATION**PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS  
DETAILS: S  M  U  NA (FURTHER EXPLANATION ATTACHED no)

1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE

 Y  N  NA

2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES

 Y  N  NA

3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT

 Y  N  NA

4. ALL DISCHARGES ARE PERMITTED

 Y  N  NA**SECTION B - RECORDKEEPING AND REPORTING EVALUATION**RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT.  
DETAILS: S  M  U  NA (FURTHER EXPLANATION ATTACHED no)

1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRs.

 Y  N  NA

2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE.

 S  M  U  NA

a) DATES, TIME(S) AND LOCATION(S) OF SAMPLING

 Y  N  NA

b) NAME OF INDIVIDUAL PERFORMING SAMPLING

 Y  N  NA

c) ANALYTICAL METHODS AND TECHNIQUES.

 Y  N  NA

d) RESULTS OF ANALYSES AND CALIBRATIONS.

 Y  N  NA

e) DATES AND TIMES OF ANALYSES.

 Y  N  NA

f) NAME OF PERSON(S) PERFORMING ANALYSES.

 Y  N  NA

3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE.

 S  M  U  NA

4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR.

 S  M  U  NA

5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA.

 Y  N  NA**SECTION C - OPERATIONS AND MAINTENANCE**TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED.  
DETAILS: See Page 1, Section D for more information. S  M  U  NA (FURTHER EXPLANATION ATTACHED yes)

1. TREATMENT UNITS PROPERLY OPERATED.

 S  M  U  NA

2. TREATMENT UNITS PROPERLY MAINTAINED.

 S  M  U  NA

3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED.

 S  M  U  NA

4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE.

 S  M  U  NA

5. ALL NEEDED TREATMENT UNITS IN SERVICE.

 S  M  U  NA

6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED.

 S  M  U  NA

7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED.

 S  M  U  NA

8. OPERATION AND MAINTENANCE MANUAL AVAILABLE.

 Y  N  NA

STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED.

 Y  N  NA

PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED.

 Y  N  NA

**SECTION C - OPERATIONS AND MAINTENANCE (CONT'D)**

9. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR?  Y  N  NA  
 IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED?  Y  N  NA  
 HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS?  Y  N  NA
10. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT?  Y  N  NA  
 IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT?  Y  N  NA

**SECTION D - SELF-MONITORING**

PERMITTEE SELF-MONITORING MEETS PERMIT REQUIREMENTS.  S  M  U  NA (FURTHER EXPLANATION ATTACHED no.)  
 DETAILS:

1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT.  Y  N  NA
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES.  Y  N  NA
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT.  Y  N  NA
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT.  Y  N  NA
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT.  Y  N  NA
6. SAMPLE COLLECTION PROCEDURES ADEQUATE  Y  N  NA
- a) SAMPLES REFRIGERATED DURING COMPOSITING.  Y  N  NA
- b) PROPER PRESERVATION TECHNIQUES USED.  Y  N  NA
- c) CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136.3.  Y  N  NA
7. IF MONITORING AND ANALYSES ARE PERFORMED MORE OFTEN THAN REQUIRED BY PERMIT, ARE THE RESULTS REPORTED IN PERMITTEE'S SELF-MONITORING REPORT?  Y  N  NA

**SECTION E - FLOW MEASUREMENT**

PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS.  S  M  U  NA (FURTHER EXPLANATION ATTACHED no.)  
 DETAILS:

1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED.  Y  N  NA  
 TYPE OF DEVICE weir
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED.  Y  N  NA
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED.  Y  N  NA
4. CALIBRATION FREQUENCY ADEQUATE. (DATE OF LAST CALIBRATION June 1997)  Y  N  NA  
 RECORDS MAINTAINED OF CALIBRATION PROCEDURES.  Y  N  NA  
 CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE.  Y  N  NA
5. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE.  Y  N  NA
6. HEAD MEASURED AT PROPER LOCATION.  Y  N  NA
7. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES.  Y  N  NA

**SECTION F - LABORATORY**

PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS.  S  M  U  NA (FURTHER EXPLANATION ATTACHED no.)  
 DETAILS:

1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(b) FOR SLUDGES)  Y  N  NA

**SECTION F - LABORATORY (CONT'D)**

2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED  Y  N  NA
3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT.  S  M  U  NA
4. QUALITY CONTROL PROCEDURES ADEQUATE.  S  M  U  NA
5. DUPLICATE SAMPLES ARE ANALYZED. 100 % OF THE TIME.  Y  N  NA
6. SPIKED SAMPLES ARE ANALYZED. 100 % OF THE TIME.  Y  N  NA
7. COMMERCIAL LABORATORY USED.  Y  N  NA

LAB NAME In - House

LAB ADDRESS \_\_\_\_\_

PARAMETERS PERFORMED \_\_\_\_\_

**SECTION G - EFFLUENT/RECEIVING WATERS OBSERVATIONS.**  S  M  U  NA (FURTHER EXPLANATION ATTACHED no.).

OUTFALL NO.	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOAT SOL.	COLOR	OTHER
001	-----	-----	-----	-----	slight	Clear	

RECEIVING WATER OBSERVATIONS N/A**SECTION H - SLUDGE DISPOSAL**SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS.  S  M  U  NA (FURTHER EXPLANATION ATTACHED no.).  
DETAILS:

1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY.  S  M  U  NA
2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503.  S  M  U  NA
3. FOR LAND APPLIED SLUDGE, TYPE OF LAND APPLIED TO: N/A (e.g., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE)

**SECTION I - SAMPLING INSPECTION PROCEDURES** (FURTHER EXPLANATION ATTACHED N/A).

1. SAMPLES OBTAINED THIS INSPECTION.  Y  N  NA
2. TYPE OF SAMPLE OBTAINED  
GRAB \_\_\_\_\_ COMPOSITE SAMPLE \_\_\_\_\_ METHOD \_\_\_\_\_ FREQUENCY \_\_\_\_\_
3. SAMPLES PRESERVED.  Y  N  NA
4. FLOW PROPORTIONED SAMPLES OBTAINED.  Y  N  NA
5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE.  Y  N  NA
6. SAMPLE REPRESENTATIVE OF VOLUME AND MATURE OF DISCHARGE.  Y  N  NA
7. SAMPLE SPLIT WITH PERMITTEE.  Y  N  NA
8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED.  Y  N  NA
9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT.  Y  N  NA

Outfall 001

DMR Calculation Check

Reporting Period: From 1997 Jan. 01 To 1997 Jan. 31  
Year Month Day Year Month Day

Parameter Checked: TSS

	<u>Quantity</u>		
	<u>Min- Mg/L</u>	<u>30-Day</u> <u>Avg-Mg/L</u>	<u>7-Day</u> <u>Avg-Mg/l</u>
Reported Value:		6.6	8.4
Calculated Value:		6.59	8.43
Permit Value:		30.00	45.00

If calculated value does not equal reported value, explain:

**Value Equal / OK**