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STATE OF ARKANSAS
DEPARTMENT OF POLLUTION CONTROL AND ECOLOGY

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LITTLE ROCK, ARKANSAS 72219-8913
PHONE: (501) 682-0656
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October 1, 1998

RECEIVED
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OCT 8 1998
6891
22039

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

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

Dear Mr. Morgan:

On August 12, 1998, 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 - July 1998 were reviewed. The following effluent excursions were noted during this time period.
March 1998 - BOD, mass loading
TSS, mass loading
- A small leak was observed in the containment wall of the # 3 raceway.
- Solids and heavy ashing was observed in the facility's new clarifier.
- The initial DO's for BOD samples are not below 9.0 mg/l, which is a requirement in the approved methods for BOD analysis.
- The lab is using an OMI manual for analytical procedures, but this manual does not site the source from which these procedures are derived from.

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 November 1, 1998.

NPDES COMPLIANCE FILES

NPDES # 22039 *Spenn coded*

DMR'S

NCR

CORRESPONDENCE

CRAS

Mr. Wyman Morgan, General Manager
City of West Memphis
October 1, 1998
Page 2

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

Sincerely,

Sam Clardy

Sam Clardy
District Field Inspector
Water Division

SCW

cc: NPDES Branch

SECTION A - PERMIT VERIFICATIONPERMIT 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 - SAMPLING

PERMITTEE SAMPLING 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
- 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 December 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 yes)
 DETAILS: See Page 1, Section D for more information.

1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(b) FOR SLUDGES) Lab manual does not cite approved methods. 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 - HouseLAB ADDRESS 502 Rushing Road, West Memphis, Arkansas 72301PARAMETERS PERFORMED BOD, TSS, and pHSECTION 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	Light green	

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 NATURE OF DISCHARGE. Y N NA
7. SAMPLE SPLIT WITH PERMITTEE. Y N NA
- 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 1998 May 01 To 1998 May 31
Year Month Day Year Month Day

Parameter Checked: BOD5-day

	<u>Quantity</u>		
	<u>30-day</u>	<u>30-Day</u>	<u>7-Day</u>
	<u>Avg-lbs/day</u>	<u>Avg-Mg/L</u>	<u>Avg-Mg/l</u>
Reported Value:	114.00	2.70	3.10
Calculated Value:	114.27	2.65	3.10
Permit Value:	1126.00	30.00	45.00

If calculated value does not equal reported value, explain:

There was a slight difference in the reported value and the calculated value due to rounding. / OK

Outfall 001
Flow Calculation Sheet

Field Data: Date August 12, 1998 Time 1315 hrs.

Head 0.52 Feet

Type & Size of Flow Monitoring Device: 6' Rectangular weir with end contractions

Name & Model of Flow Monitoring Device : Militronics - Hydroranger

Monitoring Device Flow at date & time listed above: 4.444 MGD

Reference for Flow Calculations; ISCO Open Channel Flow Measurement Handbook - Third Edition

Formula: $MGD = CFS * 0.6463$ $CFS = 3.330(4.0 - 0.2H)H^{1.5}$

Calculations: From Table 9-8 $MGD = 4.758$

% error = $\frac{\text{recorded value} - \text{calculated value}}{\text{calculated value}} (100)$

% error = $\frac{4.444 \text{ MGD} - 4.758 \text{ MGD}}{4.758 \text{ MGD}} (100) = -6.60\% \text{ error}$

% error =