

ADEQ

ARKANSAS
Department of Environmental Quality

May 11, 2006

John Rimmer, Manager
West Memphis Water and Utilities
P.O. Box 1868
West Memphis, AR 72301

RE: AFIN: 18-00109 NPDES Permit No.: AR0022039

Dear Mr. Rimmer:

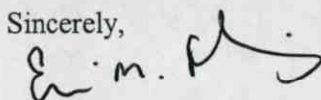
On April 24, 2006, I performed a routine compliance inspection of the waste water treatment facility in accordance with the provisions of the federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, and the regulations promulgated thereunder. This inspection revealed the following violations:

1. Only two samples were monitored for BOD and TSS the first week of November 2005, and only two samples were monitored for Fecal Coliform Bacteria (FCB) the first week of February 2006. This violates Part I Section A. of the permit requiring monitoring to be conducted on these parameters three times per week. *cc015*
2. The holding time of 6 hours was exceeded for Fecal Coliform Bacteria (FCB) samples at least 4 times in March 2006. This violates Part II Section C,3, of the permit requiring monitoring to be conducted according to test procedures approved under 40 CFR Part 136. *cc018*
3. The residual DO requirement is not being followed for BOD analysis. This violates Part II Section C,3., of the permit requiring monitoring to be conducted according to test procedures approved under 40 CFR Part 136. Samples with final dissolved oxygen of less than 1 mg/l should be avoided in the calculation of BOD unless no other samples are available. An appropriate dilution series should be used to yield results with sufficient depletion and residuals.

The above items require your immediate attention. Please submit a written response to these findings to the NPDES Enforcement Section of this Department. This response should contain documentation describing the course of action taken to correct the items noted. This corrective action should be completed as soon as possible, and the written response is due by May 30, 2006.

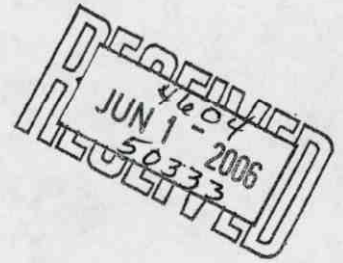
If I can be of any assistance, please contact me at 870-935-7221 ext.-12.

Sincerely,



Brent L. Walker
District 3 Field Inspector
Water Division

cc: NPDES Enforcement Branch
NPDES Permit Branch



COMPLIANCE FILE

NPDES # 22039

DMR'S *ff*

NCR *cc018*

CORRESPONDENCE

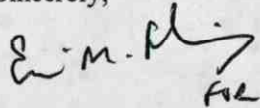
CRAS

WATER DIVISION

John Rimmer, West Memphis PCI
May 8, 2006
Page 2

If I can be of any assistance, please contact me at 870-935-7221 ext.-12.

Sincerely,

A handwritten signature in dark ink, appearing to read "Brent L. Walker". The signature is stylized and includes a small mark below it that looks like "FWL".

Brent L. Walker
District 3 Field Inspector
Water Division

cc: NPDES Branch



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

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

NPDES Compliance Inspection Report

Section A: National Data System Coding

Transaction Code			NPDES									yr/mo/day				Inspec. Type		Inspector		Fac Type										
1	N	2	5	3	A	R	0	0	2	2	0	3	9	11	12	0	6	0	4	2	4	17	18	C	19	S	20	1		
Remarks																														
A	F	I	N	1	8	-	0	0	1	0	9																			
Inspection Work Days				Facility Evaluation Rating				BI		QA		Reserved																		
67				69	70	2	71	N	72	N	73				74	75														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) West Memphis POTW 502 Rushing Rd. West Memphis, AR 72301		Entry Time /Date 0930 04/24/2006	Permit Effective Date June 1, 2003
		Exit Time/Date 1600 04/24/2006	Permit Expiration Date May 31, 2008
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Roger Batts/Project Manager/870-735-9862			Other Facility Data 35.124212°N 90.179058°W
Name, Address of Responsible Official/Title/Phone and Fax Number John Rimmer/Manager West Memphis Water and Utilities P.O. Box 1868 West Memphis, AR 72301		Contacted Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	

Section C: Areas Evaluated During Inspection (S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

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

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

** See attachment 3 for Summary of Findings/Comments **

Name(s) and Signature(s) of Inspector(s) Brent L. Walker	Agency/Office/Telephone/Fax Arkansas Dept. of Environmental Quality/Jonesboro/ (870) 935-7221 ext.-12/(870) 935-4715	Date May 9, 2006
ddw		
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date

- **Renovation/construction at the facility including the installation of a UV disinfection unit has resulted in the diversion of effluent to the EQ basin and shut-down of the plant on multiple occasions in recent weeks.**
- **The facility has received No Exposure Exclusion for Storm Water.**
- **The lab technician was not available on the day of inspection therefore only a brief overview of laboratory facilities and methods was conducted.**
- **The main lift station (Station #8) and a smaller station (Shopping Way) were visited during the course of the inspection. Both stations were in satisfactory condition.**
- **The following violations were noted:**
 1. **Only two samples were monitored for BOD and TSS the first week of November 2005, and only two samples were monitored for Fecal Coliform Bacteria (FCB) the first week of February 2006. This violates Part I Section A. of the permit requiring monitoring to be conducted on these parameters three times per week.**
 2. **The holding time of 6 hours was exceeded for Fecal Coliform Bacteria (FCB) samples at least 4 times in March 2006. This violates Part II Section C:3, of the permit requiring monitoring to be conducted according to test procedures approved under 40 CFR Part 136.**
 3. **The residual DO requirement is not being followed for BOD analysis. This violates Part II Section C:3, of the permit requiring monitoring to be conducted according to test procedures approved under 40 CFR Part 136.**