

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

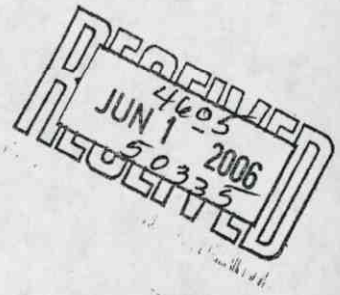
Dear Mr. Rimmer:

On April 25, 2006, I performed a routine compliance inspection of the City Pretreatment Program 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. **Inspections of the two Significant Industrial Users (SIUs) have not been conducted by city personnel in over two years. The NPDES permit and pretreatment program require the city to conduct annual inspections of all SIUs. Please note this is a repeat violation from the previous inspection on January 26, 2005.**
2. **The pH buffers in the city pretreatment laboratory were past their expiration date.**
3. **Influent and effluent samples were not analyzed for all metals (40 CFR 122 Appendix D Table III) the required 4 times during the last year.**

While the following is not a specific violation, it is an item of extreme concern. An upset of the POTW occurred as a result of a large (~9,300 gallons) volume of transmission fluid being discharged from Warren Unilube on January 25, 2006. The plant had to be shut down, flow was diverted to the EQ basin and a contractor (Hepaco) hired to perform clean-up operations. A detailed report and timeline of events was received by the department February 13, 2006. However no definitive cause was ever determined and no preventative measures have been implemented to prevent a repeat occurrence. Given the large volume of the release the source should have been determinable and corrective/preventive measures put in place to circumvent repeat or similar occurrences in the future.

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 the items noted. This corrective action should be completed as soon as possible, and the written response is due by May 30, 2006.



BOP 12

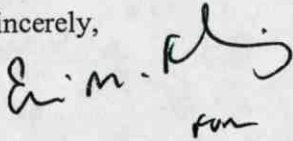
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COMPLIANCE FILED
NPDES # 22039
DMR'S *st coded*
NCR
 CORRESPONDENCE
CRAS

Summer, 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 black ink, appearing to read "Brent L. Walker". The signature is written in a cursive style with a large initial "B".

Brent L. Walker
District 3 Field Inspector
Water Division

cc: NPDES Branch

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	5	17	18	P	19	S	20	1	
Remarks																													
Inspection Work Days						Facility Evaluation Rating						BI		QA		Reserved													
67						70	N	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 0815 04/25/2006	Permit Effective Date June 1, 2003
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Denise Bosnick/Director of Environmental Quality/870-702-5141		Exit Time/Date 1530 04/25/2006	Permit Expiration Date May 31, 2008
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		Other Facility Data	
		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)

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

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

Inspections of the two Significant Industrial Users (SIUs) have not been conducted by city personnel in over two years. The pretreatment program requires the city to conduct annual inspections of all SIUs. Please note this is a repeat violation from the previous inspection on January 26, 2005.

The pH buffers in the city pretreatment laboratory were past their expiration date.

Influent and effluent samples were not analyzed for all metals (40 CFR 122 Appendix D Table III) the required 4 times during the last year.

Name(s) and Signature(s) of Inspector(s) Mont L. Walker	Agency/Office/Telephone/Fax Arkansas Dept. of Environmental Quality/Jonesboro/ (870) 935-7221 ext.-12/(870) 935-4715	Date May 1, 2006
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date