



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

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

NPDES Compliance Inspection Report

Section A: National Data System Coding

Transaction Code	NPDES										yr/mo/day					Inspec. Type	Inspector	Fac Type	
1 <input type="text" value="N"/> 2 <input type="text" value="5"/> 3 <input type="text" value="A"/> <input type="text" value="R"/> <input type="text" value="0"/> <input type="text" value="0"/> <input type="text" value="2"/> <input type="text" value="2"/> <input type="text" value="5"/> <input type="text" value="6"/> <input type="text" value="0"/> 11 <input type="text" value="0"/> 12 <input type="text" value="6"/> <input type="text" value="1"/> <input type="text" value="0"/> <input type="text" value="2"/> <input type="text" value="3"/> 17 18 <input type="text" value="C"/> 19 <input type="text" value="S"/> 20 <input type="text" value="1"/>																			
Remarks																			
<input type="text" value="A"/> <input type="text" value="F"/> <input type="text" value="I"/> <input type="text" value="N"/> <input type="text" value="4"/> <input type="text" value="7"/> <input type="text" value="-"/> <input type="text" value="0"/> <input type="text" value="0"/> <input type="text" value="1"/> <input type="text" value="4"/> <input type="text" value="5"/>																			
Inspection Work Days					Facility Evaluation Rating					BI	QA	Reserved							
67 <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> 69					70 <input type="text" value="2"/>					71 <input type="text" value="N"/>	72 <input type="text" value="N"/>	73 <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> 74 75 <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> 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 Blytheville Waste Water Treatment Plant - West Blytheville, AR Mississippi County	Entry Time /Date 0815 10/23/2006 0800 10/24/2006	Permit Effective Date December 1, 2005
	Exit Time/Date 1600 10/23/2006 1000 10/24/2006 1600 10/30/2006	Permit Expiration Date November 30, 2010
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) James Yankee/Pretreatment Coordinator/870-763-4961 Kenneth Ellis/Waste Water Superintendent/870-763-4961	Other Facility Data 35.934850°N 89.942647°W	
Name, Address of Responsible Official/Title/Phone and Fax Number Barrett Harrison/Mayor/870-763-3602 City of Blytheville P.O. Box 1784 Blytheville, AR 72315	Contacted Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	

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

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

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

A review of the January – September 2006 DMRs revealed the monthly average and 7-day maximum for NH₃-N were exceeded in both April and May due to repair work at the facility requiring blowers to be shutdown; it appeared that all SSOs were being properly reported.

Three pump stations were visited during the course of the inspection and appeared to be well maintained.

See attachment 3 for a Summary of Findings/Comments

Name(s) and Signature(s) of Inspector(s) Brent L. Walker <i>Brent L. Walker</i>	Agency/Office/Telephone/Fax Arkansas Dept. of Environmental Quality/Jonesboro/ (870) 935-7221 ext.-12/(870) 935-4715	Date December 6, 2006
Signature of Reviewer ddw	Agency/Office/Phone and Fax Numbers	Date

SECTION A - PERMIT VERIFICATION

PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS S M U NA (FURTHER EXPLANATION ATTACHED No)
 DETAILS:

- 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. S M U NA (FURTHER EXPLANATION ATTACHED No)
 DETAILS:

- 1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRs. **Improper reporting of the coefficient of variation.** 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 NE
- 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. S M U NA (FURTHER EXPLANATION ATTACHED Yes)
 DETAILS: **Airlines & diffusers in need of repair/replacement, sludge storage lagoons not maintained**

- 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. **Limited backup power – first priority with electrical provider.** 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. **Most parts are readily available in Memphis.** S M U NE
- 8. OPERATION AND MAINTENANCE MANUAL AVAILABLE. Y N NE
- STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED. Y N NA
- PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED. Y N NE

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 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 28" rectangular weir w/o end contractions

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. 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:

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, 10 % OF THE TIME Y N NA
- 6. SPIKED SAMPLES ARE ANALYZED, 10% OF THE TIME. Y N NA
- 7. COMMERCIAL LABORATORY USED. Y N NA

LAB NAME Environmental Testing and Consulting
 LAB ADDRESS 2790 Whitten Rd., Memphis TN 38133
 PARAMETERS PERFORMED Biomonitoring

SECTION G - (EFFLUENT)/RECEIVING WATERS OBSERVATIONS. S M U NA (FURTHER EXPLANATION ATTACHED _____).

Based on visual observations only.

OUTFALL NO.	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOAT SOL.	COLOR	OTHER
001	None	None	Slight	None	None	Lt. Green	--

Comments:

SECTION H - SLUDGE DISPOSAL

SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS. S M U NA (FURTHER EXPLANATION ATTACHED No).
 DETAILS: **Sludge is stored in old lagoon; lagoon is not properly maintained.**

- 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: (e.g., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE)

SECTION I - SAMPLING INSPECTION PROCEDURES (FURTHER EXPLANATION ATTACHED No)

- 1. SAMPLES OBTAINED THIS INSPECTION. Y N NA
- 2. TYPE OF SAMPLE OBTAINED - **N/A**

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
- 8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED. Y N NA
- 9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT. Y N NA

FLOW CALCULATION SHEET

Multiple flow calibration checks performed during the course of the inspection indicated the flow meter was not properly calibrated. The flow meter was calibrated by the operator at the end of the inspection and a subsequent flow calibration check revealed an error of -0.9% which is well within the permit requirement of +/- 10%.

DMR Calculation Check

Reporting Period: From 06 09 01 T o 06 09 30
Year Month Day Year Month Day

Parameter
Checked: pH

	Loading Mass Mo. Avg. - lbs/day	Concentration Monthly Min	Max
Reported Value:	<u>--</u>	<u>7.1</u>	<u>7.8</u>
Calculated Value:	<u>--</u>	<u>7.10</u>	<u>7.83</u>
Permit Value:	<u>--</u>	<u>6.0</u>	<u>9.0</u>

If calculated value does not equal reported value, explain: Equal

DMR Calculation Check

Reporting Period: From 06 05 01 ^T_o 06 05 31
 Year Month Day Year Month Day

Parameter
Checked: NH3-N

	Loading Mass Mo. Avg. - lbs/day	Concentration Monthly Mo. Avg. - mg/l	7-day Avg. - mg/l
Reported Value:	<u>23.3</u>	<u>4.9*</u>	<u>14*</u>
Calculated Value:	<u>23.3</u>	<u>4.9*</u>	<u>14*</u>
Permit Value:	<u>38</u>	<u>3</u>	<u>5</u>

* Exceeds permit limit.

If calculated value does not equal reported value, explain: Equal

NPDES Compliance Inspection Report
Summary of Findings/Comments

The following violations were noted:

- 1. Improper operation and maintenance; this violates Part II Section B: 1. of the permit. The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control which are installed or used by the permittee to achieve compliance with the conditions of this permit. The following items were noted:**
 - a. Several diffusers and air lines were in need of repair. Replacement equipment had been ordered prior to the inspection but had not been received.**
 - b. The sludge storage lagoons were not being properly maintained. If the lagoons are used for the storage of sludge the levees must be properly maintained including mowing and erosion control. Additionally, the old valves and/or outfall structures should be permanently removed or disabled to prevent an unpermitted discharge to the Waters of the State.**
- 2. Potential unpermitted discharge; the pipe and valve connecting the polishing pond to the sludge storage lagoon should be removed or permanently obstructed so as to remove the potential for an unpermitted discharge from this structure to occur. It is my understanding that a cap has been ordered to disable the potential unpermitted discharge, please advise the current status of this item.**
- 3. Exceeded effluent limits for ammonia (Both monthly and 7-day averages) in April and May 2006 due to equipment failure; this violates Part I Section A. of the permit. Blowers were shut down to ensure the safety of workers removing and replacing a failed blower. A non-compliance report was submitted and no further action is required at this time.**
- 4. Improper reporting of monitoring results; this violates Part III Item 8.4.c. of the permit. The highest (either critical dilution or control) coefficient of variation should be reported for each test species. The coefficient of variation was improperly reported for both the 2nd and 3rd quarters of 2006 for both species. Please submit corrected DMRs for these two monitoring periods.**
- 5. At the time of inspection, the flow meter was not properly calibrated to within +/-10% of the true discharge; this violates Part II Section C.2. of the permit. During the course of the inspection, the flow meter was recalibrated. Calibration checks should be performed at a frequency adequate to maintain flow readings within +/-10% of the true discharge at all times.**



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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 5 6 0 11 12 0 6 1 0 3 1 17 18 I 19 S 20 2																					
Remarks																					
0 0 3 C																					
Inspection Work Days					Facility Evaluation Rating					BI	QA	-----Reserved-----									
67 69					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) Omnium 400Terra Rd. Blytheville, AR 72315 IU of City of Blytheville Waste Water Treatment Plant AR0022560	Entry Time/Date 1010 10/31/2006	Permit Effective Date December 1, 2005
	Exit Time/Date 1030 10/31/2006	Permit Expiration Date November 30, 2010
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) John Strohkirch/Quality-Lab Leader Paul Vickerson/Plant Manager		Other Facility Data
Name, Address of Responsible Official/Title/Phone and Fax Number Paul Vickerson/Plant Manager/870-763-2022 Omnium 400 Terra Rd. Blytheville, AR 72315		
		Contacted Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

Section C: Areas Evaluated During Inspection

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

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

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

See attached IU Site Visit form for Comments

Name(s) and Signature(s) of Inspector(s) Brent L. Walker <i>Brent L. Walker</i>	Agency/Office/Telephone/Fax Arkansas Dept. of Environmental Quality/Jonesboro/ (870) 935-7221 ext. 12/(870) 935-4715	Date December 6, 2006
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date

POTW Pretreatment Program

Industrial User Site Visit

Name of Industry: Omnium

Industry Contacts: John Strohkirch/Quality-Lab Leader Paul Vickerson/Plant Manager

Type of Industry: Pesticide Formulation

Date of Visit: October 31, 2006

- | | | | | | | |
|---|----------|-----|-----------------|----|-----------------|-----|
| 1. Significant industrial user? | <u>X</u> | Yes | <u> </u> | No | <u> </u> | N/A |
| 2. Pretreatment equipment or procedures? | <u>X</u> | Yes | <u> </u> | No | <u> </u> | N/A |
| 3. Pretreatment equipment maintained and operational? | <u>X</u> | Yes | <u> </u> | No | <u> </u> | N/A |
| 4. Hazardous waste generated or stored? | <u>X</u> | Yes | <u> </u> | No | <u> </u> | N/A |
| 5. Proper solid waste disposal? | <u>X</u> | Yes | <u> </u> | No | <u> </u> | N/A |
| 6. Solvent management/TTO control? | <u>X</u> | Yes | <u> </u> | No | <u> </u> | N/A |
| 7. Suitable sampling location? | <u>X</u> | Yes | <u> </u> | No | <u> </u> | N/A |
| 8. Appropriate self-monitoring procedures/equipment? | <u>X</u> | Yes | <u> </u> | No | <u> </u> | N/A |
| 9. Adequate spill prevention? | <u>X</u> | Yes | <u> </u> | No | <u> </u> | N/A |
| 10. Industry familiar with limits and requirements? | <u>X</u> | Yes | <u> </u> | No | <u> </u> | N/A |

Additional Comments:

Facility representative appeared familiar with the pretreatment program. Facility self monitors once/year and is sampled by the city at least once per year.

Visit Conducted by: Brent L. Walker *Brent L. Walker* Date: December 6, 2006



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Remarks					
<input type="checkbox"/> 0 <input type="checkbox"/> 0 <input type="checkbox"/> 3 <input type="checkbox"/> C <input type="checkbox"/>					
Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
67 <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> 69	70 <input type="checkbox"/> N <input type="checkbox"/>	71 <input type="checkbox"/> N <input type="checkbox"/>	72 <input type="checkbox"/> N <input type="checkbox"/>	73 <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	74 75 <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> 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) Steel Related Technology (SRT) 101 Terra Rd. Blytheville, AR 72315 IU of City of Blytheville Waste Water Treatment Plant AR0022560	Entry Time/Date 1035 10/31/2006	Permit Effective Date December 1, 2005
	Exit Time/Date 1100 10/31/2006	Permit Expiration Date November 30, 2010
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Tommy Gilbert/Env.-Maint. Lendall Yeager/Supervisor Mike Bruce/Plant Manager	Other Facility Data	
Name, Address of Responsible Official/Title/Phone and Fax Number Mike Bruce/Plant Manager/870-762-1905 Steel Related Technology (SRT) 4313 State Hwy 18 E. Blytheville, AR 72315	Contacted Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	

Section C: Areas Evaluated During Inspection

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

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

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

See attached IU Site Visit form for Comments

Name(s) and Signature(s) of Inspector(s) Brent L. Walker <i>Brent L. Walker</i>	Agency/Office/Telephone/Fax Arkansas Dept. of Environmental Quality/Jonesboro/ (870) 935-7221 ext. 12/(870) 935-4715	Date December 6, 2006
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POTW Pretreatment Program

Industrial User Site Visit

Name of Industry: Steel Related Technology (SRT)

Industry Contacts: Tommy Gilbert – Env./Maintenance, Lendall Yeater - Supervisor, Mike Bruce - Manager

Type of Industry: Mold/castor repair for steel mills

Date of Visit: October 31, 2006

- | | | | | | | |
|---|-----------------|-----|-----------------|----|-----------------|-----|
| 1. Significant industrial user? | <u>X</u> | Yes | <u> </u> | No | <u> </u> | N/A |
| 2. Pretreatment equipment or procedures? | <u>X</u> | Yes | <u> </u> | No | <u> </u> | N/A |
| 3. Pretreatment equipment maintained and operational? | <u>X</u> | Yes | <u> </u> | No | <u> </u> | N/A |
| 4. Hazardous waste generated or stored? | <u>X</u> | Yes | <u> </u> | No | <u> </u> | N/A |
| 5. Proper solid waste disposal? | <u>X</u> | Yes | <u> </u> | No | <u> </u> | N/A |
| 6. Solvent management/TTO control? | <u>X</u> | Yes | <u> </u> | No | <u> </u> | N/A |
| 7. Suitable sampling location? | <u>X</u> | Yes | <u> </u> | No | <u> </u> | N/A |
| 8. Appropriate self-monitoring procedures/equipment? | <u> </u> | Yes | <u> </u> | No | <u>X</u> | N/A |
| 9. Adequate spill prevention? | <u>X</u> | Yes | <u> </u> | No | <u> </u> | N/A |
| 10. Industry familiar with limits and requirements? | <u>X</u> | Yes | <u> </u> | No | <u> </u> | N/A |

Additional Comments:

Steel Related Technologies recently purchased Sumitech; the two buildings are connected and a new permit will be issued to Steel Related Technology for two outfalls and listing them as a categorical industry

Visit Conducted by: Brent L. Walker *Brent L. Walker* Date: December 6, 2006



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Remarks					
<input type="checkbox"/> 0 <input type="checkbox"/> 0 <input type="checkbox"/> 3 <input type="checkbox"/> C <input type="checkbox"/>					
Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
67 <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> 69	70 <input type="checkbox"/> N <input type="checkbox"/>	71 <input type="checkbox"/> N <input type="checkbox"/>	72 <input type="checkbox"/> N <input type="checkbox"/>	73 <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	74 75 <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> 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) Sumitech (Now owned & operated by Steel Related Technology-SRT) 101 Terra Rd. Blytheville, AR 72315 IU of City of Blytheville Waste Water Treatment Plant AR0022560	Entry Time/Date 1035 10/31/2006	Permit Effective Date December 1, 2005
	Exit Time/Date 1100 10/31/2006	Permit Expiration Date November 30, 2010
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Tommy Gilbert/Env.-Maint. Lendall Yeager/Supervisor Mike Bruce/Plant Manager	Other Facility Data	
Name, Address of Responsible Official/Title/Phone and Fax Number Mike Bruce/Plant Manager/870-762-1905 Steel Related Technology (SRT) 4313 State Hwy 18 E. Blytheville, AR 72315	Contacted Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	

Section C: Areas Evaluated During Inspection

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

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

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

See attached IU Site Visit form for Comments

Name(s) and Signature(s) of Inspector(s) Brent L. Walker <i>Brent L. Walker</i>	Agency/Office/Telephone/Fax Arkansas Dept. of Environmental Quality/Jonesboro/ (870) 935-7221 ext. 12/(870) 935-4715	Date December 6, 2006
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date

POTW Pretreatment Program

Industrial User Site Visit

Name of Industry: Sumitech

Industry Contacts: Tommy Gilbert – Env./Maintenance, Lendall Yeater - Supervisor, Mike Bruce - Manager

Type of Industry: Nickel Plating

Date of Visit: October 31, 2006

- | | | | | | | |
|---|---------------|-----|---------------|----|---------------|-----|
| 1. Significant industrial user? | <u>X</u> | Yes | <u> </u> | No | <u> </u> | N/A |
| 2. Pretreatment equipment or procedures? | <u>X</u> | Yes | <u> </u> | No | <u> </u> | N/A |
| 3. Pretreatment equipment maintained and operational? | <u>X</u> | Yes | <u> </u> | No | <u> </u> | N/A |
| 4. Hazardous waste generated or stored? | <u>X</u> | Yes | <u> </u> | No | <u> </u> | N/A |
| 5. Proper solid waste disposal? | <u>X</u> | Yes | <u> </u> | No | <u> </u> | N/A |
| 6. Solvent management/TTO control? | <u>X</u> | Yes | <u> </u> | No | <u> </u> | N/A |
| 7. Suitable sampling location? | <u>X</u> | Yes | <u> </u> | No | <u> </u> | N/A |
| 8. Appropriate self-monitoring procedures/equipment? | <u> </u> | Yes | <u> </u> | No | <u>X</u> | N/A |
| 9. Adequate spill prevention? | <u>X</u> | Yes | <u> </u> | No | <u> </u> | N/A |
| 10. Industry familiar with limits and requirements? | <u>X</u> | Yes | <u> </u> | No | <u> </u> | N/A |

Additional Comments:

Sumitech was recently purchased by Steel Related Technologies; the two buildings are connected and a new permit will be issued to Steel Related Technology for two outfalls and listing them as a categorical industry

Visit Conducted by: Brent L. Walker *Brent L. Walker* Date: December 6, 2006

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY
PRETREATMENT COMPLIANCE INSPECTION (PCI) REPORT

Name of Municipality: Blytheville, AR

AFIN Number: 47-00145

NPDES Permit Number(s): AR0022560, AR0022578, AR0022586

Program Tracked under NPDES Permit Number: AR0022560

Fact Sheet Preparation Date: Revised as IU permits are renewed

Date of Last PCI/Audit: May 24, 2006

Date of Last Annual Report: August 31, 2006

Name of Inspector: Brent L. Walker

Date PCI Performed: October 30 and 31, 2006

Name, Title, and Telephone Number of Facility Representative:
James L. Yankee, Pretreatment Coordinator, 870-763-4961

Name and Title of Other Participants: _____
Kenneth Ellis, WWTP Superintendent

Number of IUs Visited: 3

Name(s) of IUs Visited: Sumitech, Steel Related Technology,
Omnium

AN IU SITE VISIT FORM SHOULD BE COMPLETED FOR EACH IU VISITED

NOTE: ANY QUESTION PRINTED IN ALL CAPS AND BOLD PRINT INDICATED A REGULATORY REQUIREMENT AND MUST BE ANSWERED FOR THE PCI REPORT TO BE COMPLETE. A NO ANSWER TO ONE OF THESE QUESTIONS SHOULD RESULT IN AN UNSATISFACTORY RATING.

Form approved July 1989

A. INDUSTRIAL USER SURVEY

1. List any Significant Industrial Users (SIUs) which have been added or deleted from the program since the last audit or inspection. None - Sumitech has been purchased by Steel Related Technologies; the two permits will be combined

2. Has ADEQ or EPA been notified of these changes? Yes

3. **HAS THE INDUSTRIAL USER SURVEY BEEN KEPT UPDATED?** Yes

4. What procedures are being used to update the IU Survey?
Review of Water and Sewer Connections
Chamber of Commerce

5. Total number of Significant Industrial Users, according to the definition used by the POTW. (This number must be greater than or equal to the answer to question 6) 7

6. Number of Categorical Industrial Users: 4

7. How does the POTW determine the appropriate categorical standards to apply to an IU? SIC Code

8. List all categorical IUs discharging under the approved (such program. Include the name of the IU, the regulatory category as Metal Finishing), and the regulated process (phosphating, zinc plating, etc.) Additional listings can be made in the comments section if necessary.

Name of IU:	Category:	Regulated Process:
Motor Appliance	Metal Finishing	Parts cleaning
Motor Technologies	Metal Finishing	Parts cleaning
Omnium	Pesticide Formulation	Clean-up
Sumitech	Metal Finishing	Anodizing

B. LOCAL LIMITS

1. IS THE POTW APPLYING LOCAL LIMITS WHICH HAVE BEEN APPROVED BY ADEQ OR EPA? Yes

2. Describe any apparent problems with the local limits.
None

3. How often are pollutant scans of POTW influent, effluent, and sludge performed by the POTW? Does this fulfill the requirements of the approved program (as described in the fact sheet) and part III of the NPDES permit?

Pollutant:	Frequency:	Requirement in Permit:	Program:	Comments:
Metals:				
Influent:	<u>4/yr</u>	<u>4/yr</u>	<u>N/A</u>	<u>--</u>
Effluent:	<u>4/yr</u>	<u>4/yr</u>	<u>N/A</u>	<u>--</u>
Sludge:	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>No disposal</u>
Organics:				
Influent:	<u>1/yr</u>	<u>1/yr</u>	<u>N/A</u>	<u>--</u>
Effluent:	<u>1/yr</u>	<u>1/yr</u>	<u>N/A</u>	<u>--</u>
Sludge:	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>No Disposal</u>

4. Have there been any inhibitions or upsets at the POTW (since the last PCI of Audit) which were believed to be caused by industrial discharges? If so, describe the action taken by the City to ensure that the incident would not recur. Were these actions effective?
No inhibitions or upsets.

C. INDUSTRIAL USER CONTROL MECHANISM

1. Is the POTW using the type of control mechanism (permit, agreement, etc.) required by the approved program? Yes-Permit

2. How many IU permits (or other control documents) have been issued? 7

3. DO ALL SIGNIFICANT IUS HAVE CURRENT (UNEXPIRED) CONTROL DOCUMENTS? IF NOT, LIST ALL UNPERMITTED SIUS, THE DATE OF EXPIRATION OF THEIR PREVIOUS PERMIT (IF APPLICABLE), AND THE REASON FOR DELAY IN ISSUING THE REQUIRED DOCUMENT.
Yes - Sumitech and Steel Related Technologies will be combined Into a single permit

4. Does the control document contain the following items?

An expiration date: Yes

Discharge limitations: Yes

If the program requires self-monitoring by the IUs, do the Permits contain:

IU self-monitoring requirements: Yes

IU reporting requirements: Yes

5. Indicate which of the following recommended standard conditions are contained in the control documents:

Sample location: Yes - clarified further as new permits issued.
Type of sample: Yes
Monitoring frequency: Yes
Bypass prohibition: City ordinance
Right of entry: Yes
Nontransferability: Yes
Revocation clause: Yes
Penalty Provisions: Yes
Slug load notification: Yes
Notification of process change: Yes

D. MONITORING OF IUS BY POTW

1. Indicate current inspection and sampling frequency and program requirement below:

	Current frequency:	Program Requirement:
Sampling:		
categorical IUs	<u>2/yr</u>	<u>N/A</u>
other SIUs	<u>2/yr</u>	<u>N/A</u>
Inspection:		
categorical IUs	<u>2/yr</u>	<u>N/A</u>
other SIUs	<u>2/yr</u>	<u>N/A</u>

2. HAS EACH SIU BEEN INSPECTED AND SAMPLED AT THE FREQUENCY REQUIRED BY THE APPROVED PROGRAM? Yes

3. Are inspections announced or unannounced? Both

4. Are records kept of each inspection? Yes

5. Does the inspection report contain an adequate description of the following:

Date and time of inspection: Yes

Officials present: Yes

Inspection of chemical storage areas: Yes

Description of regulated processes, categorical waste streams, and discharge location of these waste streams: Yes

Inspection of the pretreatment facilities: Yes

Review of self-monitoring records: Yes

Observation of IU self-monitoring procedures: Yes

Verification that approved analytical techniques are used: Yes

Verification of IU flow measurement (where required): Yes

6. Overall adequacy of inspection documentation: Adequate, however it is suggested that future inspection reports include more detail about the facility and inspection.

7. DOES THE POTW SAMPLE IUS FOR ALL POLLUTANTS REGULATED IN THEIR PERMITS? (IT IS NOT NECESSARY TO SAMPLE FOR ALL POLLUTANTS EVERY TIME, BUT IT MUST BE DONE PERIODICALLY). Yes

8. Are analyses performed in accordance with EPA-approved methods (40 CFR 136)? Yes

9. Are sampling and flow monitoring equipment properly maintained? Yes

10. Is the POTW keeping proper field notes and chain of custody forms? Yes

11. Is the sampling location representative of the discharge to the collection system? Yes

12. Are sampling locations identified in POTW records? Yes

13. Are sampling services available in an emergency? Yes

14. What are the POTW's procedures for tracking receipt and review of IU reports, such as BMR's, semi-annual reports, progress reports, bypass reports, and self-monitoring reports? The pretreatment coordinator receives the reports and reviews for errors and non-compliances. Tracking is done manually since there is a small number is SIUs.

15. ARE SELF-MONITORING REPORTS REVIEWED TO VERIFY THAT ANALYSES WERE PERFORMED FOR ALL REGULATED PARAMETERS, AND TO EVALUATE COMPLIANCE WITH EFFLUENT LIMITS? Yes

16. IF VIOLATIONS ARE FOUND IN REPORTS, DOES THE POTW RESPOND TO ALL VIOLATIONS? Yes

17. What are the POTW's procedures for following up violations?
**Notice of Violation followed by surcharges or fines if
required or appropriate.**

18. HAS THE POTW REVIEWED BMRS FOR COMPLIANCE WITH 40 CFR
403.12(b)?: **Yes**

Review a Baseline Monitoring Report from the POTW's file,
and indicate which of the following items can be identified
in the BMR:

Name and address: **Yes**

Other environmental permits held: **Yes**

Description of operations: **Yes**

Process flow diagrams: **Yes**

Flow measurements: **Yes**

Measurements of regulated pollutants: **Yes**

Certification of compliance by the IU: **Yes**

Compliance schedule (if needed): **Yes**

19. Additional comments on the POTW's inspection and sampling
procedures: **Overall adequate, inspections could be more
detailed.**

5. Comments on the POTW's enforcement procedures:
None, no enforcement required in the last few years.

F. POTW'S PRETREATMENT ORGANIZATION STRUCTURE

1. Is the program structure essentially the same as that presented in the approved pretreatment program? **Yes**

2. Are staffing levels adequate? **Yes**

3. Are the responsible officials familiar with the approved program? **Yes**

G. MULTIJURISDICTIONAL ISSUES

1. List any IUs which are located outside of the jurisdictional area of the POTW:
N/A

2. Does the POTW have adequate procedures for controlling IUs located outside its jurisdictional area? **N/A**

3. Does the POTW have copies of permits for IUs in other cities? **N/A**

4. Have any of these IUs met the criteria for Significant Violator? If so, have they been published by the POTW in its annual list of Significant Violators? **N/A**

5. Comments on multijurisdictional issues: **N/A**

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Sumitech

POTW Name: City of Blytheville

Industry Contacts: Tommy Gilbert, Lendall Yeater, Mike Bruce

Date and Time of Visit: 1035 October 31, 2006

Description of Manufacturing Process:
Nickel plating for steel mills

Sources of Process Wastewater:
Parts cleaning

Categorical Industry? Yes - Metal (Nickel) Plating

Basis for Limits: City ordinance and pretreatment program

Point of Application: Prior to connection to city sewer

Description of Pretreatment Equipment and Procedures:
pH adjustment/metal precipitation, filter press

Spill Prevention and Solvent Management Procedures:
All process and storage areas drain to pit with sump pump to treatment/storage tank

Sampling Location and Equipment:
Concrete manhole at northeast corner of building

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Steel Related Technology (SRT)

POTW Name: City of Blytheville

Industry Contacts: Tommy Gilbert, Lendall Yeater, Mike Bruce

Date and Time of Visit: 1035 October 31, 2006

Description of Manufacturing Process:
Rebuilding/refurbishing molds and castors for steel mills

Sources of Process Wastewater:
Parts washing

Categorical Industry? No

Basis for Limits: City ordinance and pretreatment program

Point of Application: Prior to connection to city sewer

Description of Pretreatment Equipment and Procedures:
Ozone clarifier, oil/grease removal, sedimentation

Spill Prevention and Solvent Management Procedures:
Floor drain trough from parts washing area

Sampling Location and Equipment:
Concrete manhole at northeast corner of building

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Omium

POTW Name: City of Blytheville

Industry Contacts: John Strohkirch and Paul Vickerson

Date and Time of Visit: 1010 October 31, 2006

Description of Manufacturing Process:
Pesticide Formulation

Sources of Process Wastewater:
Water from cleanup

Categorical Industry? Yes - Pesticide Formulation

Basis for Limits: City ordinance and pretreatment program

Point of Application: Prior to connection to city sewer

Description of Pretreatment Equipment and Procedures:
Batch tank treatment, sand and carbon filters,
Sample tested before discharge

Spill Prevention and Solvent Management Procedures:
No floor drains, curbs around storage areas, no solvents

Sampling Location and Equipment:
Storage tank in lower level of building or manhole by entrance
gate

PPETS CODE SHEET

PRETREATMENT COMPLIANCE INSPECTION (PCI)

		CODE
INSPECTOR'S NAME:	<u>Brent L. Walker</u>	
NAME OF FACILITY:	<u>City of Blytheville</u>	
PERMIT NUMBER USED TO TRACK PROGRAM:	<u>AR0022560</u>	NPID
DATE OF PCI:	<u>October 30 & 31, 2006</u>	DTIA

PPETS WENDB DATA ELEMENTS

NUMBER OF SIGNIFICANT IUS (SIUS):	<u>7</u>	SIUS
NUMBER OF CATEGORICAL IUS:	<u>4</u>	CIUS
SIUS NOT SAMPLED OR INSPECTED BY POTW:	<u>0</u>	NOIN
SIUS WITHOUT CONTROL MECHANISM:	<u>0</u>	NOCM
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH STANDARDS OR REPORTING:	<u>0</u>	PSNC
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH SELF-MONITORING REQUIREMENTS:	<u>0</u>	MSNC
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH SELF-MONITORING AND NOT INSPECTED OR SAMPLED BY POTW:	<u>0</u>	SNIN



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	5	6	0	11	12	0	6	1	0	3	0	17	18	P	19	S	20	1	
Remarks																													
A F I N 4 7 - 0 0 1 4 5																													
Inspection Work Days						Facility Evaluation Rating						BI		QA		Reserved													
67				69		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) Pretreatment Program City of Blytheville Waste Water Treatment Plant Blytheville, AR Mississippi County		Entry Time /Date 1000 10/30/2006 0800 10/31/2006		Permit Effective Date December 1, 2005	
		Exit Time/Date 1600 10/30/2006 1200 13/31/2006		Permit Expiration Date November 30, 2010	
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) James Yankee/Pretreatment Coordinator/870-763-4961 Kenneth Ellis/Waste Water Superintendent/870-763-4961				Other Facility Data	
Name, Address of Responsible Official/Title/Phone and Fax Number Barrett Harrison/Mayor/870-763-3602 P.O. Box 1784 Blytheville, AR 72316				Contacted 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	N	Flow Measurement	N	Operations & Maintenance	N	Sampling
N	Records/Reports	N	Self-Monitoring Program	N	Sludge Handling/Disposal	N	Pollution Prevention
N	Facility Site Review	N	Compliance Schedules	S	Pretreatment	N	Multimedia
N	Effluent/Receiving Waters	N	Laboratory	N	Storm Water	N	Other:

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

See attached PCI Report for a Summary of Findings/Comments.

Name(s) and Signature(s) of Inspector(s) Brent L. Walker <i>Brent L. Walker</i>		Agency/Office/Telephone/Fax Arkansas Dept. of Environmental Quality/Jonesboro/ (870) 935-7221 ext.-12/(870) 935-4715		Date December 6, 2006	
Signature of Reviewer ddw		Agency/Office/Phone and Fax Numbers		Date	

ADEQ

ARKANSAS
Department of Environmental Quality

December 8, 2006

Barrett E. Harrison, Mayor
City of Blytheville
P.O. Box 1784
Blytheville, AR 72315

RE: AFIN: 47-00145

NPDES Permit No.: AR0022560

Pretreatment Inspection

Dear Mr. Harrison:

On October 30 and 31, 2006, I performed a routine pretreatment compliance inspection of your 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 you are in compliance with the terms of your permit. Please see the Pretreatment Compliance Inspection Report for comments.

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 Branch

WATER DIVISION

ADEQ

ARKANSAS
Department of Environmental Quality

December 8, 2006

Barrett E. Harrison, Mayor
City of Blytheville
P.O. Box 1784
Blytheville, AR 72315

RE: AFIN: 47-00145

NPDES Permit No.: AR0022560

West Waste Water Treatment Plant

Dear Mr. Harrison:

On October 23, 24 and 30, 2006, I performed a routine compliance inspection of the West 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. Improper operation and maintenance; this violates Part II Section B: 1. of the permit. The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control which are installed or used by the permittee to achieve compliance with the conditions of this permit. The following items were noted:**
 - a. Several diffusers and air lines were in need of repair. Replacement equipment had been ordered prior to the inspection but had not been received.**
 - b. The sludge storage lagoons were not being properly maintained. If the lagoons are used for the storage of sludge the levees must be properly maintained including mowing and erosion control. Additionally, the old valves and/or outfall structures should be permanently removed or disabled to prevent an unpermitted discharge to the Waters of the State.**
- 2. Potential unpermitted discharge; the pipe and valve connecting the polishing pond to the sludge storage lagoon should be removed or permanently obstructed so as to remove the potential for an unpermitted discharge from this structure to occur. It is my understanding that a cap has been ordered to disable the potential unpermitted discharge, please advise the current status of this item.**
- 3. Exceeded effluent limits for ammonia (Both monthly and 7-day averages) in April and May 2006 due to equipment failure; this violates Part I Section A. of the permit. Blowers were shut down to ensure the safety of workers removing and replacing a failed blower. A non-compliance report was submitted and no further action is required at this time.**

WATER DIVISION

- 4. Improper reporting of monitoring results; this violates Part III Item 8.4.c. of the permit. The highest (either critical dilution or control) coefficient of variation should be reported for each test species. The coefficient of variation was improperly reported for both the 2nd and 3rd quarters of 2006 for both species. Please submit corrected DMRs for these two monitoring periods.**

- 5. At the time of inspection, the flow meter was not properly calibrated to within +/-10% of the true discharge; this violates Part II Section C.2. of the permit. During the course of the inspection, the flow meter was recalibrated. Calibration checks should be performed at a frequency adequate to maintain flow readings within +/-10% of the true discharge at all times.**

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 **January 5, 2007**.

If I can be 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