

ADEQ

ARKANSAS
Department of Environmental Quality

January 24, 2008

John Rimmer, General Manager
West Memphis Utilities Commission
P.O. Box 1868
West Memphis, AR 72301

RE: City of West Memphis POTW

AFIN: 18-00109

NPDES Permit No.: AR0022039

Dear Mr. Rimmer:

On December 19 and 21, 2007, 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 violation:

The in house laboratory does not have a formal written QA/QC program in place as required by Part II Section B:1.a and Section C:3 of the permit. You may wish to contact Jane Hurley at 501-682-0938 or hurleyj@adeq.state.ar.us in our laboratory for assistance in developing your laboratory's QA/QC program.

The above item requires your immediate attention. Please submit a written response to this finding to the Water Division Enforcement Section of this Department at the following address:

Water Division Enforcement Section
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317

This response should contain detailed documentation describing the course of action taken to correct the item noted. This corrective action should be completed as soon as possible, and the written response is due by February 19, 2008.

For additional information you may contact the enforcement section by telephone at 501-682-0639 or by fax at 501-682-0910.

John Rimmer, West Memphis POTW
January 24, 2008
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If I can be of any assistance, please contact me at walker@adeq.state.ar.us or 870-935-7221 ext.-12.

Sincerely,



Brent L. Walker
District 3 Field Inspector
Water Division

cc: Water Division Enforcement Branch
Water Division Permits Branch


| | |
|--|------------------------------------|
|  <p style="text-align: center;">UNITED STATES ENVIRONMENTAL PROTECTION AGENCY Washington, D.C. 20460</p> <h2 style="text-align: center;">NPDES Compliance Inspection Report</h2> | Form Approved OMB No. 2040-0003 |
|--|------------------------------------|

| 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 | 7 | 1 | 2 | 1 | 9 | 17 | 18 | C | 19 | S | 20 | 1 |
| Remarks | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 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 (<i>For industrial users discharging to POTW, also include POTW name and NPDES permit number</i>) West Memphis WWTP 502 Rushing Rd. West Memphis, AR Crittenden County | <table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:50%;">Entry Time/Date 1430 12/19/2007 1320 12/21/2007</td> <td style="width:50%;">Permit Effective Date June 1, 2003</td> </tr> <tr> <td>Exit Time/Date 1555 12/19/2007 1530 12/21/2007</td> <td>Permit Expiration Date May 31, 2008</td> </tr> </table> | Entry Time/Date 1430 12/19/2007 1320 12/21/2007 | Permit Effective Date June 1, 2003 | Exit Time/Date 1555 12/19/2007 1530 12/21/2007 | Permit Expiration Date May 31, 2008 |
| Entry Time/Date 1430 12/19/2007 1320 12/21/2007 | Permit Effective Date June 1, 2003 | | | | |
| Exit Time/Date 1555 12/19/2007 1530 12/21/2007 | Permit Expiration Date May 31, 2008 | | | | |
| Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Paul Holloway/Waste Water Superintendent/870-735-9862 Patricia Dixon/Laboratory | Other Facility Data | | | | |
| Name, Address of Responsible Official/Title/Phone and Fax Number John Rimmer/General Manager/870-735-3355 West Memphis Utilities Commission 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 | S | Sampling |
| S | Records/Reports | M | Self-Monitoring Program | S | Sludge Handling/Disposal | S | Pollution Prevention |
| S | Facility Site Review | N | Compliance Schedules | N | Pretreatment | N | Multimedia |
| M | Effluent/Receiving Waters | U | Laboratory | S | Storm Water | N | Other: |

| Section D: Summary of Findings/Comments (Attach additional sheets if necessary) |
|---|
| DMRs submitted since the last inspection were reviewed and the following effluent violations were noted: May 2007 exceeded FCB Monthly and 7-day avg., June 2007 exceeded FCB 7-day avg., and July 2007 exceeded Monthly and 7-day avg. Noncompliance reports were submitted as required. |
| There appeared to be a small amount of floating grease present in the effluent wet well. The new permit is expected to have Oil and Grease limits and the city is currently performing an Oil and Grease study on the collection system, influent and effluent. |
| The following violation was noted and cited in the attached letter: The in house laboratory does not have a formal written QA/QC program in place as required by Part II Section B:1.a and Section C:3 of the permit. |

| | | |
|--|---|---------------------------------|
| Name(s) and Signature(s) of Inspector(s) Brent L. Walker  | Agency/Office/Telephone/Fax AR Dept. of Environmental Quality-Jonesboro (870) 935-7221 ext. 12/(870) 935-4715 (Fax) | Date January 24, 2008 |
| Signature of Reviewer | Agency/Office/Phone and Fax Numbers | Date |

SECTION A: PERMIT VERIFICATION

PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS

S M U NA NE

DETAILS:

- | | |
|--|--|
| 1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES: | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE |
| 3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 4. ALL DISCHARGES ARE PERMITTED: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |

SECTION B: RECORDKEEPING AND REPORTING EVALUATION

RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT

S M U NA NE

DETAILS:

- | | |
|--|---|
| 1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE: | <input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE |
| a. DATES AND TIME(S) OF SAMPLING: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| b. EXACT LOCATION(S) OF SAMPLING: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| c. NAME OF INDIVIDUAL PERFORMING SAMPLING: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| d. ANALYTICAL METHODS AND TECHNIQUES: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| e. RESULTS OF CALIBRATIONS: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| f. RESULTS OF ANALYSES: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| g. DATES AND TIMES OF ANALYSES: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| h. NAME OF PERSON(S) PERFORMING ANALYSES: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE: | <input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR: | <input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |

SECTION C: OPERATIONS AND MAINTENANCE

TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED

S M U NA NE

DETAILS:

- | | |
|---|---|
| 1. TREATMENT UNITS PROPERLY OPERATED: | <input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 2. TREATMENT UNITS PROPERLY MAINTAINED: | <input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED: <u>Facility has installed a new generator</u> | <input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE: | <input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 5. ALL NEEDED TREATMENT UNITS IN SERVICE: | <input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED: | <input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED: | <input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 8. OPERATION AND MAINTENANCE MANUAL AVAILABLE: | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE |
| 9. STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 10. PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 11. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 12. IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 13. HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 14. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT: <u>May 2007 – Oil dumped in collection system</u> | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 15. IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT: <u>Exceeded FCB Monthly and 7-day average</u> | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |

SECTION D: SAMPLING

PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS

S M U NA NE

DETAILS:

- | | |
|---|--|
| 1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 6. SAMPLE COLLECTION PROCEDURES ADEQUATE: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| a. SAMPLES REFRIGERATED DURING COMPOSITING: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| b. PROPER PRESERVATION TECHNIQUES USED: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| c. CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 7. IF MONITORING IS PERFORMED MORE OFTEN THAN REQUIRED ARE RESULTS REPORTED ON THE DMR: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |

SECTION E: FLOW MEASUREMENT

PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS

S M U NA NE

DETAILS:

- | | |
|--|--|
| 1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: __ TYPE OF DEVICE: | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE |
| 2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 4. CALIBRATION FREQUENCY ADEQUATE: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 5. RECORDS MAINTAINED OF CALIBRATION PROCEDURES: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 6. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE: | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE |
| 7. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 8. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 9. HEAD MEASURED AT PROPER LOCATION: | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE |

SECTION F: LABORATORY

PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS

S M U NA NEDETAILS: No formal written QA/QC Program

- | | |
|---|--|
| 1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(B) FOR SLUDGES) : | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED: | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE |
| 3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 4. QUALITY CONTROL PROCEDURES ADEQUATE: | <input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 5. DUPLICATE SAMPLES ARE ANALYZED $\geq 10\%$ OF THE TIME: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 6. SPIKED SAMPLES ARE ANALYZED $\geq 10\%$ OF THE TIME: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 7. COMMERCIAL LABORATORY USED: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| a. LAB NAME: <u>Environmental Testing and Consulting</u> | |
| b. LAB ADDRESS: <u>Memphis, TN</u> | |
| c. PARAMETERS PERFORMED: <u>FCB & Acute Toxicity</u> | |
| 8. BIOMONITORING PROCEDURES ADEQUATE: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| a. PROPER ORGANISMS USED: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| b. PROPER DILUTION SERIES FOLLOWED: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| c. PROPER TEST METHODS AND DURATION: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| d. RETESTS AND/OR TRE PERFORMED AS REQUIRED: | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE |

SECTION G: EFFLUENT/RECEIVING WATERS OBSERVATIONS

BASED ON VISUAL OBSERVATIONS ONLY S M U NA NE

DETAILS: Observation made in effluent wet well prior to pumping to receiving stream.

| OUTFALL #: | OIL SHEEN | GREASE | TURBIDITY | VISIBLE FOAM | FLOATING SOLIDS | COLOR | OTHER |
|------------|-----------|--------|-----------|--------------|-----------------|-------|-------|
| 001 | None | Slight | Low | None | None | Clear | -- |
| | | | | | | | |
| | | | | | | | |

SECTION H: SLUDGE DISPOSAL

SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS S M U NA NE

DETAILS: Sludge is hauled to Shelby Co. Landfill (TN) for disposal.

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

SECTION I: SAMPLING INSPECTION PROCEDURES

SAMPLE RESULTS WITHIN PERMIT REQUIREMENTS S M U NA NE

DETAILS:

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

SECTION J: STORM WATER POLLUTION PREVENTION PLAN

STORM WATER MANAGEMENT MEETS PERMIT REQUIREMENTS S M U NA NE

DETAILS: SWPPP was reviewed during an engineering site visit on December 11, 2007

- 1. SWPPP UPDATED AS NEEDED:__ DATE OF LAST UPDATE: Y N NA NE
- 2. SITE MAP INCLUDING ALL DISCHARGES AND SURFACE WATERS: Y N NA NE
- 3. POLLUTION PREVENTION TEAM IDENTIFIED: Y N NA NE
- 4. POLLUTION PREVENTION TEAM PROPERLY TRAINED: Y N NA NE
- 5. LIST OF POTENTIAL POLLUTANT SOURCES: Y N NA NE
- 6. LIST OF POTENTIAL SOURCES AND PAST SPILLS AND LEAKS: Y N NA NE
- 7. ALL NON-STORM WATER DISCHARGES ARE AUTHORIZED: Y N NA NE
- 8. LIST OF STRUCTURAL BMPS: Y N NA NE
- 9. LIST OF NON-STRUCTURAL BMPS: Y N NA NE
- 10. BMPS PROPERLY OPERATED AND MAINTAINED: Y N NA NE
- 11. INSPECTIONS CONDUCTED AS REQUIRED: Y N NA NE

FLOW CALCULATION SHEET

The facility uses a partial pipe flow meter with no primary flow device for performing calibration checks.

Date: Time:

Head in Inches: Feet:

Type & Size of Primary Flow Measurement Device:

Name & Model of Secondary Flow Measurement Device:

Date of last Calibration of Secondary Flow Device:

Recorded Flow at Date & Time Listed Above: (Facility Flow Meter)

Calculated Flow at Date & Time Listed Above:
 (Flow is calculated using flow charts in: ISCO Open Channel Flow Measurement Handbook-5th Edition)

| | | | | | |
|-----------|------------------|---|------------------|-------|--|
| % Error = | Recorded Value | - | Calculated Value | X 100 | |
| | Calculated Value | | | | |

| | | | | | |
|-----------|--|---|--|-------|--|
| % Error = | | - | | X 100 | |
| | | | | | |

| | | | |
|-----------|--|-------|--|
| % Error = | | X 100 | |
| | | | |

| | | | |
|-----------|--|-------|--|
| % Error = | | X 100 | |
| | | | |

| | | | |
|-----------|--|---|--|
| % Error = | | % | |
| | | | |

Comments:

DMR Calculation Check

Reporting Period: From 2007 11 01 To 2007 11 30
Year **Month** **Day** **Year** **Month** **Day**

Parameter Checked: FCB

| | Loading | Concentration | |
|--------------------------|---------------------------|------------------------|--------------------------|
| | Mass | Monthly | |
| | Mo. Avg. - lbs/day | Mo. Avg. - mg/l | 7-day Avg. - mg/l |
| Reported Value: | <u>NA</u> | <u>68.5</u> | <u>340.8</u> |
| Calculated Value: | <u>NA</u> | <u>69</u> | <u>341</u> |
| Permit Value: | <u>NA</u> | <u>1000</u> | <u>2000</u> |

If calculated value does not equal reported value, explain: Differences due to rounding

DMR Calculation Check

Reporting Period: From 2007 11 01 To 2007 11 30
Year Month Day Year Month Day

Parameter Checked: BOD

| | Loading Mass Mo. Avg. - lbs/day | Concentration Monthly Mo. Avg. - mg/l | 7-day Avg. - mg/l |
|--------------------------|--|--|--------------------------|
| Reported Value: | <u>274</u> | <u>8.1</u> | <u>11.6</u> |
| Calculated Value: | <u>274</u> | <u>8.0</u> | <u>11.6</u> |
| Permit Value: | <u>1126</u> | <u>30</u> | <u>45</u> |

If calculated value does not equal reported value, explain: Differences due to rounding

037784



West Memphis Utility Commission

P.O. Box 1868 • 604 East Cooper
(870) 735-3355 • Fax (870) 732-7623
West Memphis, Arkansas 72303



To: Greg Hurley, Water Division Enforcement Section
From: Paul Holloway and John Rimmer
Subject: Non-Compliance of Inspection
Date: January 31, 2008

On December 19 and 21, 2007, Mr. Brent Walker inspected our Plant and stated that we needed an In-house QA/QC Program. As of December 31, 2007 our QA/QC program was set up and put in place. As per that section of our permit, Part II Section B:1.a and Section C:3. Enclosed is a print-out of our QA/QC parameters. If you have any other questions, call 870-735-9862.

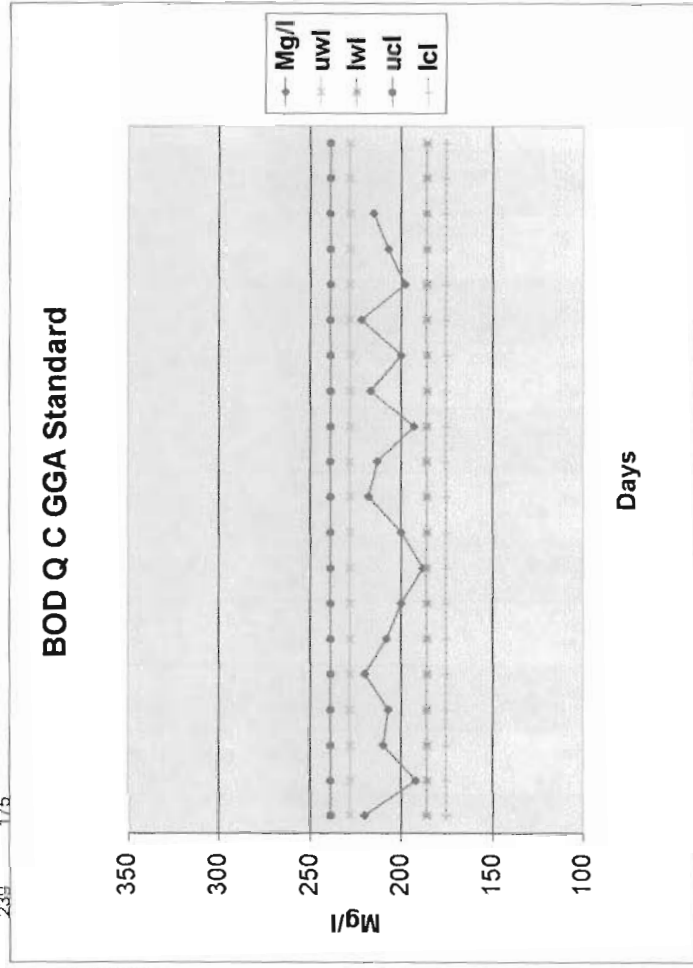
A handwritten signature in cursive that reads "John Rimmer".

General Manager
John Rimmer

BOD QC Glucose- Glutamic Acid Standard

(*) indicates inhibited sid

| Chart no. | Date | Influent mg/L | uwl | lwl | ucl | lcl |
|-----------|------------|---------------|-----|-----|-----|-----|
| 1 | 11/28/2007 | 220 | 228 | 186 | 239 | 175 |
| 2 | 11/29/2007 | 192 | 228 | 186 | 239 | 175 |
| 3 | 12/5/2007 | 210 | 228 | 186 | 239 | 175 |
| 4 | 12/6/2007 | 207 | 228 | 186 | 239 | 175 |
| 5 | 12/12/2007 | 220 | 228 | 186 | 239 | 175 |
| 6 | 12/12/2007 | 208 | 228 | 186 | 239 | 175 |
| 7 | 12/18/2007 | 200 | 228 | 186 | 239 | 175 |
| 8 | 12/19/2007 | 188 | 228 | 186 | 239 | 175 |
| 9 | 12/27/2007 | 200 | 228 | 186 | 239 | 175 |
| 10 | 12/28/2007 | 218 | 228 | 186 | 239 | 175 |
| 11 | 1/2/2008 | 213 | 228 | 186 | 239 | 175 |
| 12 | 1/3/2008 | 193 | 228 | 186 | 239 | 175 |
| 13 | 1/9/2008 | 217 | 228 | 186 | 239 | 175 |
| 14 | 1/10/2008 | 200 | 228 | 186 | 239 | 175 |
| 15 | 1/16/2008 | 222 | 228 | 186 | 239 | 175 |
| 16 | 1/17/2008 | 198 | 228 | 186 | 239 | 175 |
| 17 | 1/22/2008 | 207 | 228 | 186 | 239 | 175 |
| 18 | 1/23/2008 | 215 | 228 | 186 | 239 | 175 |
| 19 | 1/30/2008 | | 228 | 186 | 239 | 175 |
| 20 | 1/31/2008 | | 228 | 186 | 239 | 175 |



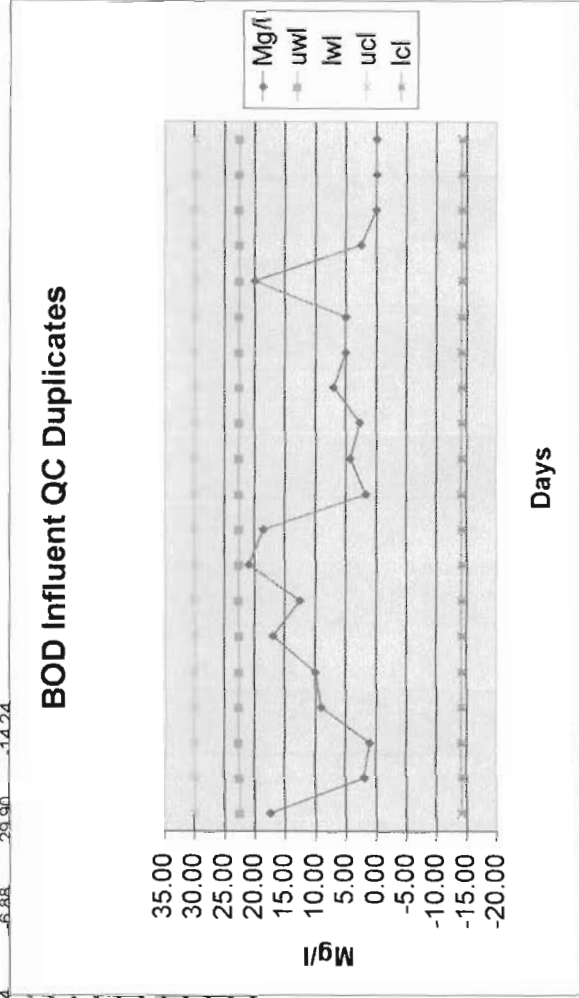
| | | |
|---------------|-------|------|
| Average | 207 | mg/L |
| Std Deviation | 10.58 | mg/L |
| Maximum | 345 | mg/L |
| Minimum | 188 | mg/L |
| uwl | 228 | mg/L |
| lwl | 186 | mg/L |
| ucl | 239 | mg/L |
| lcl | 175 | mg/L |

Acceptable Range on Glucose is
198 +/- 30.5 or 167.5 - 228.5

BOD Influent QC Duplicates

| Chart no. | Date | Influent mg/L | Influent Dup | uwl | lwl | ucl | lcl |
|-----------|------------|---------------|--------------|-------|-------|-------|--------|
| 1 | 11/12/2007 | 215 | 232.5 | 22.54 | -6.88 | 29.90 | -14.24 |
| 2 | 11/14/2007 | 162.3 | 164.3 | 22.54 | -6.88 | 29.90 | -14.24 |
| 3 | 11/18/2007 | 189 | 190 | 22.54 | -6.88 | 29.90 | -14.24 |
| 4 | 11/26/2007 | 129 | 138 | 22.54 | -6.88 | 29.90 | -14.24 |
| 5 | 11/29/2007 | 345 | 335 | 22.54 | -6.88 | 29.90 | -14.24 |
| 6 | 12/3/2007 | 303 | 320 | 22.54 | -6.88 | 29.90 | -14.24 |
| 7 | 12/10/2007 | 260 | 247.5 | 22.54 | -6.88 | 29.90 | -14.24 |
| 8 | 12/12/2007 | 159 | 210 | 22.54 | -6.88 | 29.90 | -14.24 |
| 9 | 12/16/2007 | 84 | 102.5 | 22.54 | -6.88 | 29.90 | -14.24 |
| 10 | 12/25/2007 | 148.3 | 146.7 | 22.54 | -6.88 | 29.90 | -14.24 |
| 11 | 12/27/2007 | 165.7 | 170 | 22.54 | -6.88 | 29.90 | -14.24 |
| 12 | 12/31/2007 | 131.7 | 129 | 22.54 | -6.88 | 29.90 | -14.24 |
| 13 | 1/8/2008 | 186 | 193 | 22.54 | -6.88 | 29.90 | -14.24 |
| 14 | 1/9/2008 | 162.7 | 167.7 | 22.54 | -6.88 | 29.90 | -14.24 |
| 15 | 1/15/2008 | 176 | 181 | 22.54 | -6.88 | 29.90 | -14.24 |
| 16 | 1/21/2008 | 235 | 255 | 22.54 | -6.88 | 29.90 | -14.24 |
| 17 | 1/23/2008 | 210 | 212.5 | 22.54 | -6.88 | 29.90 | -14.24 |
| 18 | | | | 22.54 | -6.88 | 29.90 | -14.24 |
| 19 | | | | 22.54 | -6.88 | 29.90 | -14.24 |
| 20 | | | | 22.54 | -6.88 | 29.90 | -14.24 |

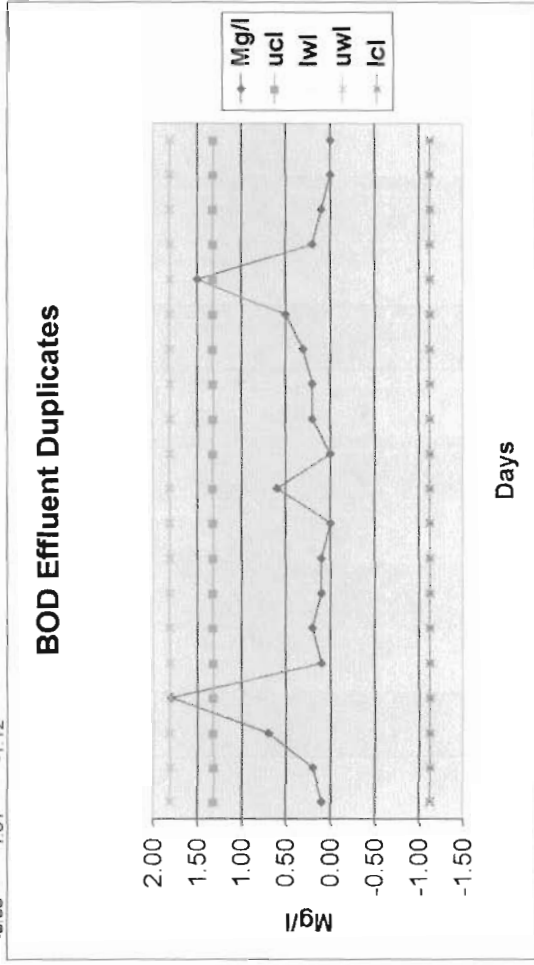
BOD Influent QC Duplicates



BOD Effluent QC Duplicates

| Chart no. | Date | Effluent mg/L | Effluent Dup | uwl | lwl | ucl | lcl |
|-----------|------------|---------------|--------------|------|-------|------|-------|
| 1 | 11/15/2007 | 4.3 | 4.2 | 1.32 | -0.63 | 1.81 | -1.12 |
| 2 | 11/17/2007 | 11.8 | 12 | 1.32 | -0.63 | 1.81 | -1.12 |
| 3 | 11/12/2007 | 9 | 9.7 | 1.32 | -0.63 | 1.81 | -1.12 |
| 4 | 11/18/2007 | 15.6 | 13.8 | 1.32 | -0.63 | 1.81 | -1.12 |
| 5 | 11/22/2007 | 8.4 | 8.5 | 1.32 | -0.63 | 1.81 | -1.12 |
| 6 | 11/26/2007 | 5.4 | 5.6 | 1.32 | -0.63 | 1.81 | -1.12 |
| 7 | 12/3/2007 | 7 | 7.1 | 1.32 | -0.63 | 1.81 | -1.12 |
| 8 | 12/5/2007 | 8.1 | 8 | 1.32 | -0.63 | 1.81 | -1.12 |
| 9 | 12/10/2007 | 7.1 | 7.1 | 1.32 | -0.63 | 1.81 | -1.12 |
| 10 | 12/16/2007 | 1.9 | 2.5 | 1.32 | -0.63 | 1.81 | -1.12 |
| 11 | 12/18/2007 | 3.3 | 3.3 | 1.32 | -0.63 | 1.81 | -1.12 |
| 12 | 12/25/2007 | 4.2 | 4.4 | 1.32 | -0.63 | 1.81 | -1.12 |
| 13 | 12/31/2007 | 4.3 | 4.5 | 1.32 | -0.63 | 1.81 | -1.12 |
| 14 | 1/2/2008 | 3.7 | 3.4 | 1.32 | -0.63 | 1.81 | -1.12 |
| 15 | 1/7/2008 | 6.9 | 7.4 | 1.32 | -0.63 | 1.81 | -1.12 |
| 16 | 1/14/2008 | 5.8 | 4.3 | 1.32 | -0.63 | 1.81 | -1.12 |
| 17 | 1/15/2008 | 3 | 2.8 | 1.32 | -0.63 | 1.81 | -1.12 |
| 18 | 1/21/2008 | 3.2 | 3.3 | 1.32 | -0.63 | 1.81 | -1.12 |
| 19 | | | | 1.32 | -0.63 | 1.81 | -1.12 |
| 20 | | | | 1.32 | -0.63 | 1.81 | -1.12 |

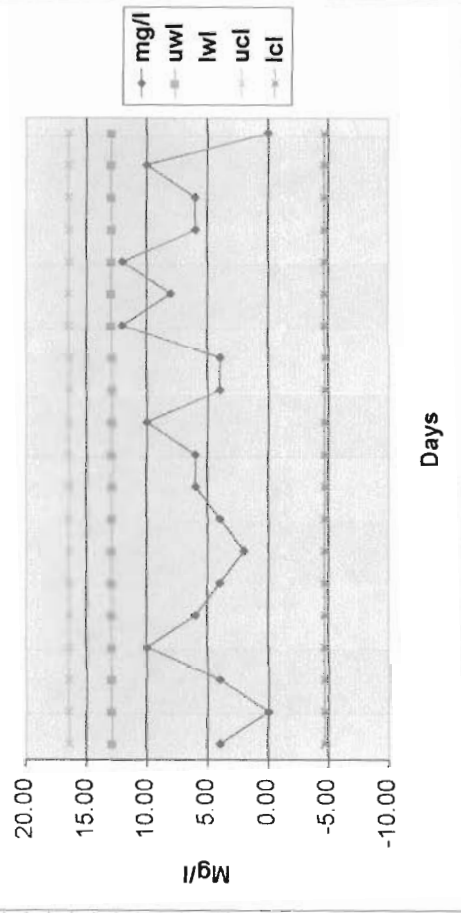
| | mg/L |
|---------------|-------|
| Average | 0.35 |
| Std Deviation | 0.49 |
| Maximum | 1.80 |
| Minimum | 0.00 |
| uwl | 1.32 |
| lwl | -0.63 |
| ucl | 1.81 |
| lcl | -1.12 |



TSS Inf, mg/l Dup.

| Date | TSS mg/l | TSS mg/l Dup | uwl | iwl | ucl | lcl |
|--------------|----------|--------------|-------|-------|-------|-------|
| 1 12/17/2007 | 94 | 98 | 12.95 | -1.15 | 16.47 | -4.67 |
| 2 12/18/2007 | 122 | 122 | 12.95 | -1.15 | 16.47 | -4.67 |
| 3 12/25/2007 | 126 | 130 | 12.95 | -1.15 | 16.47 | -4.67 |
| 4 12/26/2007 | 262 | 272 | 12.95 | -1.15 | 16.47 | -4.67 |
| 5 12/27/2007 | 128 | 134 | 12.95 | -1.15 | 16.47 | -4.67 |
| 6 12/31/2007 | 128 | 124 | 12.95 | -1.15 | 16.47 | -4.67 |
| 7 1/1/2008 | 86 | 84 | 12.95 | -1.15 | 16.47 | -4.67 |
| 8 1/2/2008 | 128 | 124 | 12.95 | -1.15 | 16.47 | -4.67 |
| 9 1/7/2008 | 248 | 242 | 12.95 | -1.15 | 16.47 | -4.67 |
| 10 1/8/2008 | 548 | 542 | 12.95 | -1.15 | 16.47 | -4.67 |
| 11 1/9/2008 | 272 | 262 | 12.95 | -1.15 | 16.47 | -4.67 |
| 12 1/14/2008 | 112 | 116 | 12.95 | -1.15 | 16.47 | -4.67 |
| 13 1/15/2008 | 124 | 120 | 12.95 | -1.15 | 16.47 | -4.67 |
| 14 1/16/2008 | 166 | 178 | 12.95 | -1.15 | 16.47 | -4.67 |
| 15 1/21/2008 | 356 | 364 | 12.95 | -1.15 | 16.47 | -4.67 |
| 16 1/22/2008 | 144 | 156 | 12.95 | -1.15 | 16.47 | -4.67 |
| 17 1/23/2008 | 144 | 138 | 12.95 | -1.15 | 16.47 | -4.67 |
| 18 1/28/2008 | 120 | 126 | 12.95 | -1.15 | 16.47 | -4.67 |
| 19 1/29/2008 | 222 | 232 | 12.95 | -1.15 | 16.47 | -4.67 |
| 20 1/30/2008 | | | 12.95 | -1.15 | 16.47 | -4.67 |

TSS Inf, Mg/l Dup



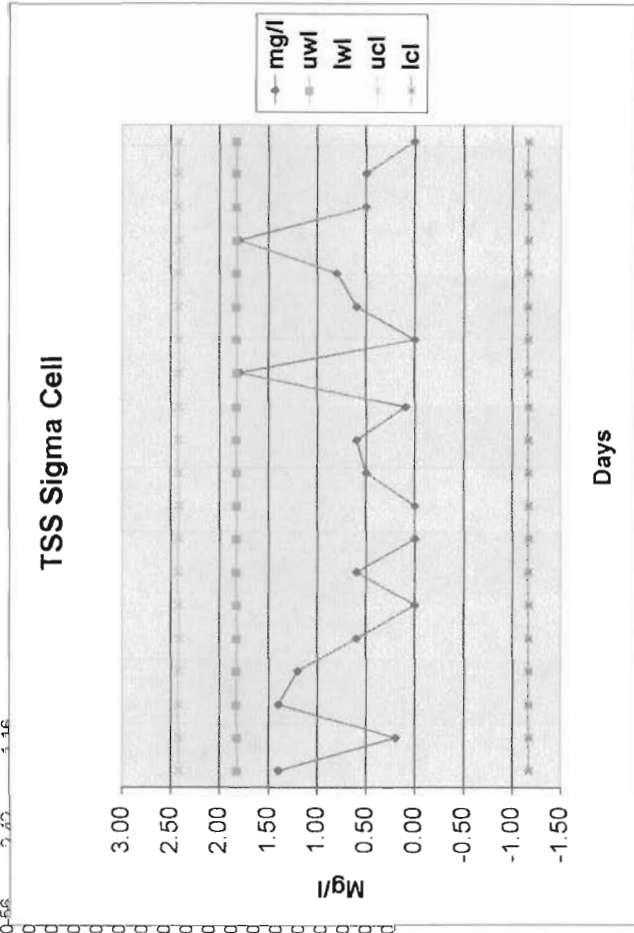
| Average | mg/L |
|---------------|-------|
| Std Deviation | 3.62 |
| Maximum | 12.00 |
| Minimum | 0.00 |
| uwl | 12.95 |
| lwl | -1.15 |
| ucl | 16.47 |
| lcl | -4.67 |

1
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3
4
5

TSS Sigma Cell

| | Date | TSS mg/l | TSS mg/L Dup | uwl | lwl | ucl | lcl |
|----|------------|----------|--------------|------|-------|------|-------|
| 1 | 12/28/2007 | 80 | 78.6 | 1.82 | -0.56 | 2.42 | -1.16 |
| 2 | 12/31/2007 | 20.8 | 20.6 | 1.82 | -0.56 | 2.42 | -1.16 |
| 3 | 1/1/2008 | 80.2 | 78.8 | 1.82 | -0.56 | 2.42 | -1.16 |
| 4 | 1/2/2008 | 20.8 | 19.6 | 1.82 | -0.56 | 2.42 | -1.16 |
| 5 | 1/3/2008 | 80.2 | 79.6 | 1.82 | -0.56 | 2.42 | -1.16 |
| 6 | 1/7/2008 | 20.2 | 20.2 | 1.82 | -0.56 | 2.42 | -1.16 |
| 7 | 1/8/2008 | 80 | 79.4 | 1.82 | -0.56 | 2.42 | -1.16 |
| 8 | 1/9/2008 | 20.2 | 20.2 | 1.82 | -0.56 | 2.42 | -1.16 |
| 9 | 1/10/2008 | 80 | 80 | 1.82 | -0.56 | 2.42 | -1.16 |
| 10 | 1/14/2008 | 20.9 | 20.4 | 1.82 | -0.56 | 2.42 | -1.16 |
| 11 | 1/15/2008 | 80.6 | 80 | 1.82 | -0.56 | 2.42 | -1.16 |
| 12 | 1/17/2008 | 20.9 | 21 | 1.82 | -0.56 | 2.42 | -1.16 |
| 13 | 1/21/2008 | 80.6 | 78.8 | 1.82 | -0.56 | 2.42 | -1.16 |
| 14 | 1/22/2008 | 21 | 21 | 1.82 | -0.56 | 2.42 | -1.16 |
| 15 | 1/23/2008 | 80.8 | 80.2 | 1.82 | -0.56 | 2.42 | -1.16 |
| 16 | 1/24/2008 | 21 | 20.2 | 1.82 | -0.56 | 2.42 | -1.16 |
| 17 | 1/28/2008 | 80.8 | 79 | 1.82 | -0.56 | 2.42 | -1.16 |
| 18 | 1/29/2008 | 20.3 | 19.8 | 1.82 | -0.56 | 2.42 | -1.16 |
| 19 | 1/30/2008 | 80.7 | 80.2 | 1.82 | -0.56 | 2.42 | -1.16 |
| 20 | 1/31/2008 | | | 1.82 | -0.56 | 2.42 | -1.16 |

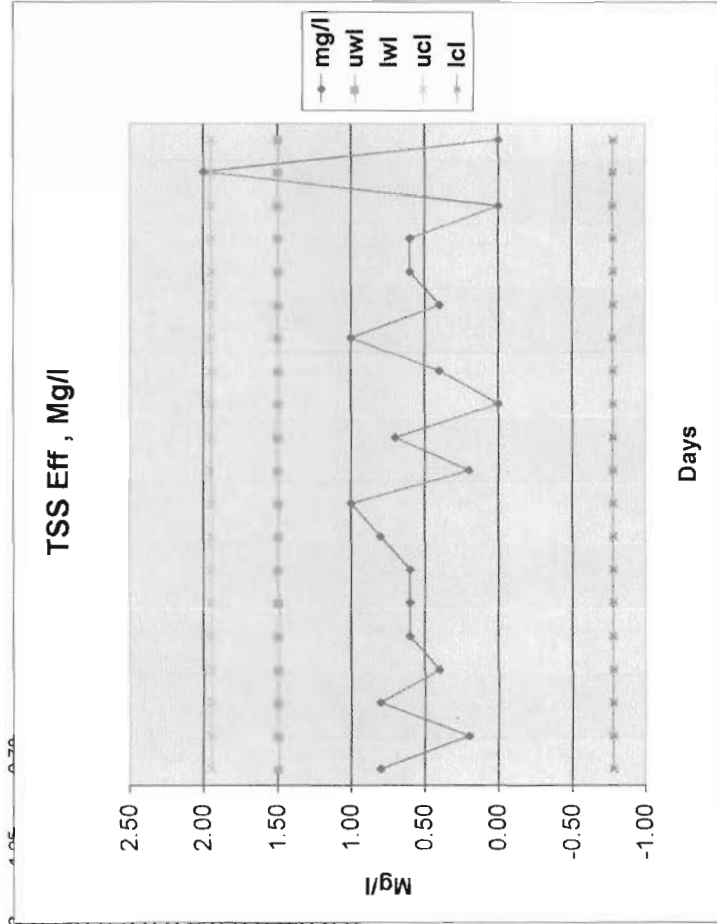
| | mg/L |
|---------------|-------|
| Average | 0.63 |
| Std Deviation | 0.60 |
| Maximum | 1.80 |
| Minimum | 0.00 |
| uwl | 1.82 |
| lwl | -0.56 |
| ucl | 2.42 |
| lcl | -1.16 |



TSS Eff, mg/l

| Date | Eff Mg/l | Eff Mg/l Dup | uwl | iwl | ucl | lcl |
|------------|----------|--------------|------|-------|------|-------|
| 12/17/2007 | 5 | 5.8 | 1.49 | -0.32 | 1.95 | -0.78 |
| 12/18/2007 | 5.6 | 5.8 | 1.49 | -0.32 | 1.95 | -0.78 |
| 12/25/2007 | 4.6 | 5.4 | 1.49 | -0.32 | 1.95 | -0.78 |
| 12/26/2007 | 5 | 4.6 | 1.49 | -0.32 | 1.95 | -0.78 |
| 12/27/2007 | 6 | 5.4 | 1.49 | -0.32 | 1.95 | -0.78 |
| 12/31/2007 | 6 | 6.6 | 1.49 | -0.32 | 1.95 | -0.78 |
| 1/1/2008 | 6.8 | 7.4 | 1.49 | -0.32 | 1.95 | -0.78 |
| 1/2/2008 | 7.4 | 6.6 | 1.49 | -0.32 | 1.95 | -0.78 |
| 1/7/2008 | 16.7 | 17.7 | 1.49 | -0.32 | 1.95 | -0.78 |
| 1/8/2008 | 4.8 | 5 | 1.49 | -0.32 | 1.95 | -0.78 |
| 1/9/2008 | 18 | 17.3 | 1.49 | -0.32 | 1.95 | -0.78 |
| 1/14/2008 | 9.6 | 9.6 | 1.49 | -0.32 | 1.95 | -0.78 |
| 1/15/2008 | 7.4 | 7.8 | 1.49 | -0.32 | 1.95 | -0.78 |
| 1/16/2008 | 8.4 | 7.4 | 1.49 | -0.32 | 1.95 | -0.78 |
| 1/21/2008 | 8.4 | 8.8 | 1.49 | -0.32 | 1.95 | -0.78 |
| 1/22/2008 | 7.6 | 8.2 | 1.49 | -0.32 | 1.95 | -0.78 |
| 1/23/2008 | 9.2 | 8.6 | 1.49 | -0.32 | 1.95 | -0.78 |
| 1/28/2008 | 10.8 | 10.8 | 1.49 | -0.32 | 1.95 | -0.78 |
| 1/29/2008 | 50 | 52 | 1.49 | -0.32 | 1.95 | -0.78 |
| 1/30/2008 | | | 1.49 | -0.32 | 1.95 | -0.78 |

| Average | mg/L |
|---------------|-------|
| Std Deviation | 0.59 |
| Maximum | 0.45 |
| Minimum | 2.00 |
| uwl | 1.49 |
| iwl | -0.32 |
| ucl | 1.95 |
| lcl | -0.78 |

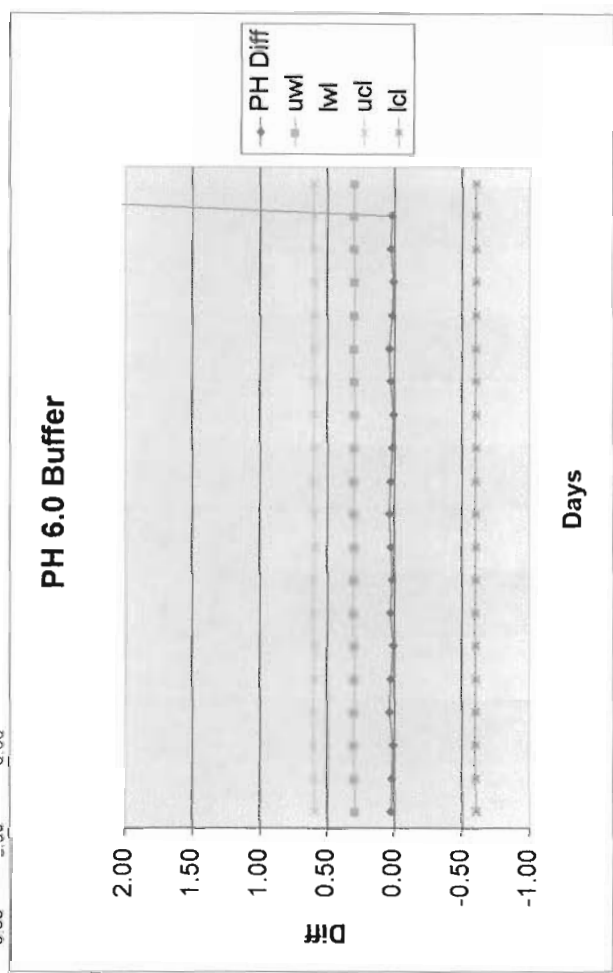


PH 6.0 Buffer

| Date | PH 6.0 | PH 6.0 Diff | PH 6 Calibration | PH | uwl |
|--------------|--------|-------------|------------------|------|------|
| 1 12/18/2007 | 6.0 | 6.03 | 0.03 | 0.30 | 0.30 |
| 2 12/19/2007 | 6.0 | 6.02 | 0.02 | 0.30 | 0.30 |
| 3 12/26/2007 | 6.0 | 6.01 | 0.01 | 0.30 | 0.30 |
| 4 12/27/2007 | 6.0 | 6.04 | 0.04 | 0.30 | 0.30 |
| 5 12/28/2007 | 6.0 | 6.03 | 0.03 | 0.30 | 0.30 |
| 6 1/1/2008 | 6.0 | 6.01 | 0.01 | 0.30 | 0.30 |
| 7 1/2/2008 | 6.0 | 6.03 | 0.03 | 0.30 | 0.30 |
| 8 1/3/2008 | 6.0 | 6.02 | 0.02 | 0.30 | 0.30 |
| 9 1/8/2008 | 6.0 | 6.03 | 0.03 | 0.30 | 0.30 |
| 10 1/9/2008 | 6.0 | 6.04 | 0.04 | 0.30 | 0.30 |
| 11 1/10/2008 | 6.0 | 6.03 | 0.03 | 0.30 | 0.30 |
| 12 1/15/2008 | 6.0 | 6.02 | 0.02 | 0.30 | 0.30 |
| 13 1/16/2008 | 6.0 | 6.01 | 0.01 | 0.30 | 0.30 |
| 14 1/17/2008 | 6.0 | 6.03 | 0.03 | 0.30 | 0.30 |
| 15 1/22/2008 | 6.0 | 6.04 | 0.04 | 0.30 | 0.30 |
| 16 1/23/2008 | 6.0 | 6.02 | 0.02 | 0.30 | 0.30 |
| 17 1/24/2008 | 6.0 | 6.01 | 0.01 | 0.30 | 0.30 |
| 18 1/29/2008 | 6.0 | 6.03 | 0.03 | 0.30 | 0.30 |
| 19 1/30/2008 | 6.0 | 5.98 | 0.02 | 0.30 | 0.30 |
| 20 1/31/2008 | 6.0 | 6.00 | 6.00 | 0.30 | 0.30 |

| Average | mg/L |
|---------|------|
| 0.32 | mg/L |
| 1.34 | mg/L |
| 6.00 | mg/L |
| 0.01 | mg/L |
| 0.30 | mg/L |
| -0.30 | mg/L |
| 0.60 | mg/L |
| -0.60 | mg/L |

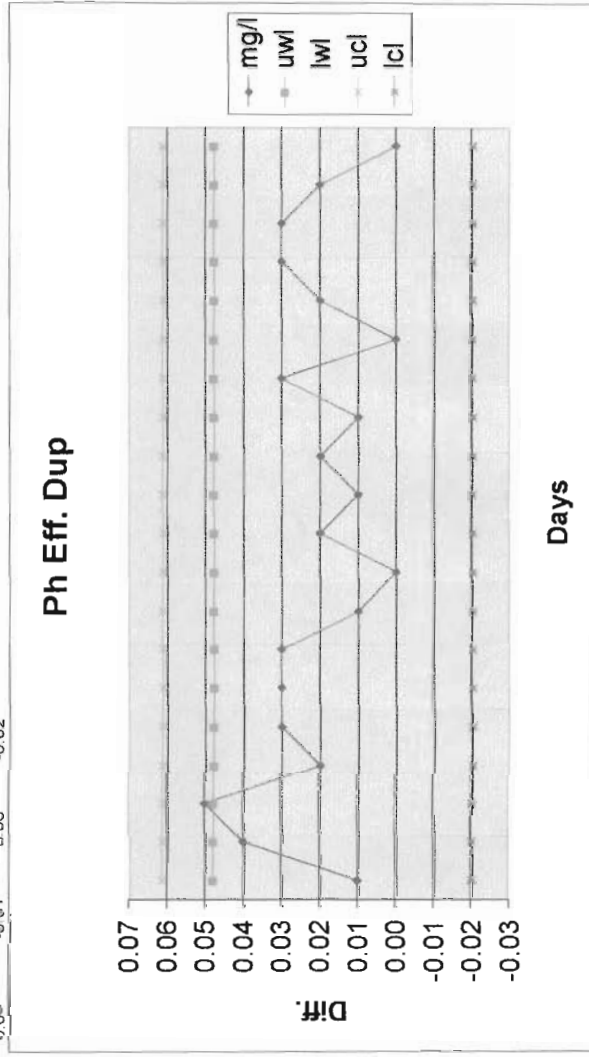
| iwl | ucl | lcl |
|-------|------|-------|
| -0.30 | 0.60 | -0.60 |
| -0.30 | 0.60 | -0.60 |



| Std Deviation | mg/L |
|---------------|------|
| 0.32 | mg/L |
| 1.34 | mg/L |
| 6.00 | mg/L |
| 0.01 | mg/L |
| 0.30 | mg/L |
| -0.30 | mg/L |
| 0.60 | mg/L |
| -0.60 | mg/L |

PH Eff Duplicate

| Date | PH Eff | PH Eff Dup. | Ph 6 Calibration | uwl | iwl | ucl | lcl |
|--------------|--------|-------------|------------------|------|-------|------|-------|
| 1 12/18/2007 | 6.46 | 6.47 | 0.01 | 0.05 | -0.01 | 0.06 | -0.02 |
| 2 12/19/2007 | 6.84 | 6.8 | 0.04 | 0.05 | -0.01 | 0.06 | -0.02 |
| 3 12/26/2007 | 6.85 | 6.8 | 0.05 | 0.05 | -0.01 | 0.06 | -0.02 |
| 4 12/27/2007 | 7.17 | 7.15 | 0.02 | 0.05 | -0.01 | 0.06 | -0.02 |
| 5 12/28/2007 | 6.73 | 6.76 | 0.03 | 0.05 | -0.01 | 0.06 | -0.02 |
| 6 1/1/2008 | 7.22 | 7.19 | 0.03 | 0.05 | -0.01 | 0.06 | -0.02 |
| 7 1/2/2008 | 6.86 | 6.83 | 0.03 | 0.05 | -0.01 | 0.06 | -0.02 |
| 8 1/3/2008 | 7.02 | 7.03 | 0.01 | 0.05 | -0.01 | 0.06 | -0.02 |
| 9 1/8/2008 | 7.14 | 7.14 | 0.00 | 0.05 | -0.01 | 0.06 | -0.02 |
| 10 1/9/2008 | 7.02 | 7.04 | 0.02 | 0.05 | -0.01 | 0.06 | -0.02 |
| 11 1/10/2008 | 7.01 | 7 | 0.01 | 0.05 | -0.01 | 0.06 | -0.02 |
| 12 1/15/2008 | 6.91 | 6.89 | 0.02 | 0.05 | -0.01 | 0.06 | -0.02 |
| 13 1/16/2008 | 7.14 | 7.15 | 0.01 | 0.05 | -0.01 | 0.06 | -0.02 |
| 14 1/17/2008 | 7.11 | 7.08 | 0.03 | 0.05 | -0.01 | 0.06 | -0.02 |
| 15 1/22/2008 | 7.1 | 7.1 | 0.00 | 0.05 | -0.01 | 0.06 | -0.02 |
| 16 1/23/2008 | 6.68 | 6.7 | 0.02 | 0.05 | -0.01 | 0.06 | -0.02 |
| 17 1/24/2008 | 7.08 | 7.05 | 0.03 | 0.05 | -0.01 | 0.06 | -0.02 |
| 18 1/29/2008 | 7.09 | 7.06 | 0.03 | 0.05 | -0.01 | 0.06 | -0.02 |
| 19 1/30/2008 | 6.94 | 6.96 | 0.02 | 0.05 | -0.01 | 0.06 | -0.02 |
| 20 1/31/2008 | | | 0.00 | 0.05 | -0.01 | 0.06 | -0.02 |



| Average | mg/L |
|---------------|-------|
| Std Deviation | 0.02 |
| Maximum | 0.01 |
| Minimum | 0.05 |
| uwl | 0.00 |
| lwl | 0.05 |
| ucl | -0.01 |
| lcl | 0.06 |
| | -0.02 |

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QA/QC Corrective Action Sheet

West Memphis Utilities WWTP
502 Rushing Road
West Memphis, AR 72301
Manager: Paul Holloway

Lab Analyst: Patricia Dixon
Date:

Parameter out of range _____

| | | |
|--|-----|----|
| Was glassware washed properly? | Yes | No |
| Was glassware checked with Bromothymol Blue? | Yes | No |
| Was instrument calibrated? | Yes | No |
| Are Reagents out of date? | Yes | No |
| Were all Lab equipment at proper temperatures? | Yes | No |
| Were samples measured accurately? | Yes | No |

Corrective Action Taken: _____

