

June 30, 2008

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

West Waste Water Treatment Plant

RE: AFIN: 47-00544 NPDES Permit No.: AR0022560

Dear Mr. Harrison:

On May 22, 2008, 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. Improper operation and maintenance; this violates Part II Section B:1.a. of the permit. The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures. This provision requires the operation of backup or auxiliary facilities or similar systems which are installed by a permittee only when the operation is necessary to achieve compliance with the conditions of the permit. The following items were noted:
 - a. The bar screen was out of service.
 - b. The UV disinfection system had electrical connectors that were in need of replacement thus causing some tubes to be out of service.
 - c. 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.
- 2. Improper/inadequate monitoring procedures; this violates Part II Section C:3. of the permit. Monitoring must be conducted according to test procedures approved under 40 CFR Part 136, unless other test procedures have been specified in this permit. The permittee shall calibrate and perform maintenance procedures on all monitoring and analytical instrumentation at intervals frequent enough to insure accuracy of measurements and shall insure that both calibration and maintenance activities will be

conducted. An adequate analytical quality control program, including the analysis of sufficient standards, spikes, and duplicate samples to insure the accuracy of all required analytical results shall be maintained by the permittee or designated commercial laboratory. At a minimum, spikes and duplicate samples are to be analyzed on 10% of the samples. The following items were noted:

- a. Thermometers used for measuring automated sampler and laboratory equipment temperature had not been calibrated.
- b. The method used for determining Total Suspended Solids (TSS), EPA Method 160.2 is no longer listed as an approved method in 40 CFR Part 136.
- c. The laboratory QA/QC program is inadequate; control charts containing warning limits and control limits should be developed.
- 3. The following violations of effluent limits were noted:
 - a. February 2007 Exceeded NH3-N 7-Day and Monthly Average
 - b. March 2007 Exceeded NH3-N 7-Day and Monthly Average
 - c. August 2007 Exceeded NH3-N 7-Day and Monthly Average
 - d. September 2007 Exceeded NH3-N and FCB 7-Day and Monthly Average
 - e. October 2007 Exceeded NH3-N 7-Day and Monthly Average NCR's were submitted; no further action is required at this time.

The above items require your immediate attention. Please submit a written response to these findings to the Water Division Enforcement Branch of this Department at the following address:

Water Division Enforcement Branch 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 items noted. This corrective action should be completed as soon as possible, and the written response is due by July 22, 2008.

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

Barrett E. Harrison, West WWTP June 30, 2008 Page 3

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

Bred & Walter

Water Division

cc: Water Division Enforcement Branch

Water Division Permits Branch

ADEQ Water NPDES Inspection	AFIN: 47-00544	Permit #: AR0022560

9	≎ EPA								Form Approved OMB No. 2040-0003		
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY Washington, D.C. 20460 NPDES Compliance Inspection Report											
	NPDE	<u> </u>	omphane	e mspec	เนอ	11 [Keport				
			S	Section A: Nation	nal Da	ıta Sy	stem Coding				
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	Inspection Work Days]	Facility Evaluation R	ating	BI I	1 1)A I I I I I	 I	Reserved		
	67 69		70 1	71	N	72	N 73 74 75		80		
				Section I	3: Fac	cility l	Data		_		
incl	ne and Location of Facility Inspected and POTW name and NPDES permits of Blytheville Waste Water Treat	num	ber)	harging to POTW	V, also	,	Entry Time/Date 0845 5/22/2008 0945 5/28/2008		Permit Effective Date December 1, 2005		
Blyt	1 NCR 635 theville, AR sissippi Co.						Exit Time/Date 1615 5/22/2008 1745 5/28/2008		Permit Expiration Date November 30, 2010		
Jan	ne(s) of On-Site Representative(s)/T nes Yankee/Pretreatment Coordinateth Ellis/Waste Water Superinte	ator/8	370-763-4961 Tama		Techr	nician	1	Otl	ner Facility Data		
Bar City P.O	ne, Address of Responsible Official/ rett Harrison/Mayor/870-763-3600 y of Blytheville . Box 1784 theville, AR 72315		Phone and Fax Numb	per			Contacted Yes □ No ✓				
				tion C: Areas Ev							
S	- ·	S	<u> </u>		$\mathbf{U} = \mathbf{U}$		sfactory, N = Not Evaluated)	c	a v		
S	Permit	U	Flow Measuremen		N	_	erations & Maintenance	S	<u> </u>		
	Records/Reports		Self-Monitoring P				dge Handling/Disposal		Pollution Prevention		
M S	Facility Site Review	U	Compliance Scheo	dules	N		treatment	N N			
8	Effluent/Receiving Waters	_	Laboratory	of Findings/Com	S		rm Water ach additional sheets if necessar	·	Other:		
*** Multiple Violations *** *** See the attached letter for a summary of Findings/Comments ***											
Nai	Name(s) and Signature(s) of Inspector(s) Agency/Office/Telephone/Fax Date								Date		
	nt L. Walker But L Walk			AR Dept. of Er	viron	ment	al Quality-Jonesboro				
Bre	nt L. Walker	w C		(870) 935-7221	ext. 1	2/(87	0) 935-4715 (Fax)		June 30, 2008		
Sig	nature of Reviewer			Agency/Office	/Phone	none and Fax Numbers			Date		

ADEQ Water NPDES Inspection	AFIN: 47-00544	Permit #: AR0022560

SECTION A: PERMIT VERIFICATION						
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS	✓S		1 🗆	<u> </u>	NA	
DETAILS:						
1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE:						□NE
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES:						□NE
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT:						□NE
4. ALL DISCHARGES ARE PERMITTED:			ØY	Пи	□NA	□NE
SECTION B: RECORDKEEPING AND REPORTING EVALUATION					_	
RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT	✓S			J [NA	□NE
DETAILS:						
1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS:						□NE
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE:		⊠s				□NE
a. DATES AND TIME(S) OF SAMPLING:			ØY	Пи	□NA	□NE
b. EXACT LOCATION(S) OF SAMPLING:						□NE
c. NAME OF INDIVIDUAL PERFORMING SAMPLING:						□NE
d. ANALYTICAL METHODS AND TECHNIQUES:			ØY	□N	□NA	□NE
e. RESULTS OF CALIBRATIONS:			ØY	□N	□NA	□NE
f. RESULTS OF ANALYSES:						□NE
g. DATES AND TIMES OF ANALYSES:			ØY	□и	□NA	□NE
h. NAME OF PERSON(S) PERFORMING ANALYSES:			ØY	□N	□NA	□NE
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE:		⊠s	□м	□u	□NA	□NE
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR:		□s	□м	□u	□NA	ØNE
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA:			₫Y	□N	□NA	□NE
SECTION C: OPERATIONS AND MAINTENANCE						
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED	□s		ı Ø	J []NA	
DETAILS: Sludge lagoons in need of mowing/clearing; barscreen out of service; UV systems	em nee					
1. TREATMENT UNITS PROPERLY OPERATED:						□NE
2. TREATMENT UNITS PROPERLY MAINTAINED:						□NE
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED:						□NE
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE:						□NE
5. ALL NEEDED TREATMENT UNITS IN SERVICE: Barscreen out of service		□s	□м	₫u	□NA	□NE
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED:						□NE
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED:		□s	Øм	□u	□NA	□NE
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE:			□Y	□N	□NA	ØNE
9. STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED:			₫Y	□N	□NA	□NE
10. PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED:			₫Y	□и	□NA	□NE
11. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR:			₫Y	□и	□NA	□NE
12. IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED:			₫Y	□n	□NA	□NE
13. HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS:			₫Y	□N	□NA	□NE
14. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT: Water main broke			✓Y	□и	□NA	□NE
15. IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT: NH3-N and FCB			✓Y	□и	□NĀ	□NE

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SI	ECTION D: SAMPLING	
PE	ERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS	☑S □M □U □NA □NE
DE	ETAILS:	
1.	SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT:	Øy □n □na □ne
2.	LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES:	ØY □N □NA □NE
3.	FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT:	Øy □n □na □ne
4.	SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT:	☑Y □N □NA □NE
5.	SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT:	☑Y □N □NA □NE
6.	SAMPLE COLLECTION PROCEDURES ADEQUATE:	Øy □n □na □ne
а	a. SAMPLES REFRIGERATED DURING COMPOSITING:	☑Y □N □NA □NE
b	D. PROPER PRESERVATION TECHNIQUES USED:	Øy □n □na □ne
c	:. CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136:	☑Y □N □NA □NE
7.	IF MONITORING IS PERFORMED MORE OFTEN THAN REQUIRED ARE RESULTS REPORTED ON THE DMR:	□Y □N ☑NA □NE
SI	ECTION E: FLOW MEASUREMENT	
PE	ERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS	☑S □M □U □NA □NE
DE	ETAILS:	
1.	PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: TYPE OF DEVICE: Rect. weir	⊠y □n □na □ne
2.	FLOW MEASURED AT EACH OUTFALL AS REQUIRED:	☑Y □N □NA □NE
3.	SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED:	☑Y □N □NA □NE
4.	CALIBRATION FREQUENCY ADEQUATE:	⊠y □n □na □ne
5.	RECORDS MAINTAINED OF CALIBRATION PROCEDURES:	⊠y □n □na □ne
6.	CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE:	⊠y □n □na □ne
7.	FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE:	☑Y □N □NA □NE
8.	FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES:	☑Y □N □NA □NE
9.	HEAD MEASURED AT PROPER LOCATION:	Øy □n □na □ne
SI	ECTION F: LABORATORY	
PE	ERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS	□S □M ☑U □NA □NE
DE	ETAILS:	
1.	EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(B) FOR SLUDGES): Using EPA 16 TSS which is no longer an approved method	0.2 for ☐Y ☑N ☐NA ☐NE
2.	IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED:	□Y ☑N □NA □NE
3.	SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT: Thermometers not calibrated	□Y ☑N □NA □NE
4.	QUALITY CONTROL PROCEDURES ADEQUATE: No control charts	□Y ☑N □NA □NE
5.	DUPLICATE SAMPLES ARE ANALYZED ≥10% OF THE TIME:	✓Y □N □NA □NE
6.	SPIKED SAMPLES ARE ANALYZED ≥10% OF THE TIME:	✓Y □N □NA □NE
7.	COMMERCIAL LABORATORY USED:	☑Y □N □NA □NE
	a. LAB NAME: <u>ETC</u>	
	D. LAB ADDRESS: Memphis, TN	
	: PARAMETERS PERFORMED: Chronic Biomonitoring	
8.	BIOMONITORING PROCEDURES ADEQUATE:	☑Y □N □NA □NE
	a. PROPER ORGANISMS USED:	ØY □N □NA □NE
	p. PROPER DILUTION SERIES FOLLOWED:	ØY □N □NA □NE
	2. PROPER TEST METHODS AND DURATION:	ØY □N □NA □NE
	H. RETESTS AND/OR TRE PERFORMED AS REQUIRED:	
	The state of the s	

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SECTIO	SECTION G: EFFLUENT/RECEIVING WATERS OBSERVATIONS									
	ON VISUAL OBS					М ѕ Пм Г	lu □na □ne			
DETAIL		21(1)(1)(0)(0)								
OUTFALL #		GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	COLOR	OTHER			
001	None	None	Low	None	None	Lt. Green				
		1	1	1						
SECTIO	SECTION H: SLUDGE DISPOSAL									
SLUDGI	DISPOSAL MEI	ETS PERMIT F	REQUIREMEN	TS		□s □м □	IU ⊠NA □NE			
DETAIL	S: No disposal; fa	cility stores slu	udge in old lago	oon	•					
1. SLUDG	E MANAGEMENT ADEQU	IATE TO MAINTAIN EF	FLUENT QUALITY:			□s □n	I □U ☑NA □NE			
2. SLUDG	E RECORDS MAINTAINEI	D AS REQUIRED BY 4	0 CFR 503:			□s □n	I □U ☑NA □NE			
3. FOR LA	ND APPLIED SLUDGE, T	YPE OF LAND APPLIE	D TO: (E.G., FOREST	, AGRICULTURAL, PUI	BLIC CONTACT SITE):					
SECTIO	N I: SAMPLIN	G INSPECTION	ON PROCED	URES						
SAMPLI	RESULTS WITH	HIN PERMIT R	EQUIREMENT	S		□s □m □	U ØNA □NE			
DETAIL	S:									
1. SAMPL	ES OBTAINED THIS INSP	ECTION:					′□N ☑NA □NE			
2. TYPE (F SAMPLE: ☐GRAB:	□COMPOSITE: N	METHOD: FREQUE	ENCY:						
3. SAMPL	ES PRESERVED:						′ □n ☑na □ne			
4. FLOW	PROPORTIONED SAMPLE	S OBTAINED:					′ □N ☑NA □NE			
5. SAMPL	E OBTAINED FROM FACI	LITY'S SAMPLING DE	/ICE:				′ □N ☑NA □NE			
6. SAMPL	E REPRESENTATIVE OF	VOLUME AND NATUR	E OF DISCHARGE:				′ □N ☑NA □NE			
7. SAMPL	E SPLIT WITH PERMITTE	E:					′ □N ☑NA □NE			
8. CHAIN	OF-CUSTODY PROCEDU	RES EMPLOYED:					′ □N ☑NA □NE			
9. SAMPL	ES COLLECTED IN ACCO	RDANCE WITH PERM	IIT:				′ □N ☑NA □NE			
	ON J: STORM \									
	WATER MANAG				5		U Øna □ne			
	S: No Exposure E			<u>37</u>						
1. SWPPF	PUPDATED AS NEEDED:	DATE OF LAST UP	PDATE:				' □N ☑NA □NE			
2. SITE M	AP INCLUDING ALL DISC	HARGES AND SURFA	CE WATERS:				' □N ☑NA □NE			
3. POLLUTION PREVENTION TEAM IDENTIFIED:							' □N ☑NA □NE			
4. POLLUTION PREVENTION TEAM PROPERLY TRAINED:							' □N ☑NA □NE			
5. LIST OF POTENTIAL POLLUTANT SOURCES:							' □N ☑NA □NE			
6. LIST OF POTENTIAL SOURCES AND PAST SPILLS AND LEAKS: 7. ALL NON-STORM WATER DISCHARGES ARE AUTHORIZED:							ON MA ONE			
		✓ □N ☑NA □NE								
8. LIST O		ON MA ONE								
	NON-STRUCTURAL BMI						ON MA ONE			
	PROPERLY OPERATED A						ON MA ONE			
11. INSPE	11. INSPECTIONS CONDUCTED AS REQUIRED:									

FLOW CALCULATION SHEET										
Date: 5/2	2/2008	2 7	ime: 10 2	24						
Date. 312	2/2000	<u> </u>	iiiie. 10	24						
Head in Inc	Head in Inches: 3.75 Feet: 0.292									
Type & Size	Type & Size of Primary Flow Measurement Device:									
28" Rectar			<u>ivicasarci</u>	HOIR DOVICE	•					
			EL N4			D.1	·			
Name & Mo	odel of	Secondary	Flow Mea	asurement D	evice:	Polyson	ic Transducer			
Date of last	Calib	ration of Sec	condary F	low Device:	7/24	/2007				
Decembed 5	low of	Date & Tim	a Listad	Abovo: 650	O GPM					
Recorded F	now ai	Date & Till	ie Listea i	Above: 63	J GPINI		(Facility Flow Meter)			
		at Date & Tir			29 GPI					
(Flow is calculated	ed using	flow charts in: I	SCO Open C	hannel Flow Mea	asurement	Handbook-5 th	Edition)			
% Error =	Reco	orded Value - Calculated Value				e X 100				
% E1101 =		Calcu	ulated Val	ue	^					
		650	T_T	629						
% Error =		000	629	023	─ X 1	100				
	 			1						
% Error =		21	X 100							
	629									
% Error =		0.033	X 100							
0/ [2.2								
% Error =		3.3	%							
Comments:										

DMR Calculation Check

Reporting Period: From 08 02 01 To 08 02 29

Year Month Day Year Month Day

Parameter Checked: CBOD

	Loading Mass	Concentration Monthly				
	Mo. Avg lbs/day	Mo. Avg mg/l	7-day Avg mg/l			
Reported Value:	23.6	3.1	4.4			
Calculated Value:	23.6	3.1	4.4			
Permit Value:	313	25	38			

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

DMR Calculation Check

Reporting Period: From 08 02 01 To 08 02 29

Year Month Day Year Month Day

Parameter Checked: NH3-N

	Loading Mass	Concentration Monthly				
	Mo. Avg lbs/day	Mo. Avg mg/l	7-day Avg mg/l			
Reported Value:	4.5	0.6	0.9			
Calculated Value:	4.5	0.6	0.9			
Permit Value:	38	3	5			

If calculated value does not equal reported value, explain: <u>Equal</u>