

February 4, 2009

John Rimmer, General Manager City of West Memphis WWTP P.O. Box 1868 West Memphis, AR 72303

RE: Sanitary Sewer Overflow Inspection

AFIN: 18-00109 NPDES Permit No.: AR0022039

Dear Mr. Rimmer:

On December 22, 2008, I performed a Sanitary Sewer Overflow Inspection (SSO) of the waste water collection system 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:

There was an excess accumulation of large solids in the wet well of Pump Station #17. At the time of the inspection there was a shoe and basketball along with other smaller solids that were visible in the wet well.

There were solids on the ground (rags and grease balls) at Pump Station #8 (Main Pump Station) that had apparently been removed during pump replacement.

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 February 24, 2009.

«Cognizant_Official», «Facility_Name» February 4, 2009 Page 2

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

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: « AFIN »	Permit #: «Permit »

&	EPA																		(orm Ap 3 No. 2			
	UNITED STATES ENVIRONMENTAL PROTECTION AGENCY Washington, D.C. 20460																							
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L	Inspection Work Days		Facil	lity Ev	/aluati	on Ra	nting			BI		QA]	Reserv	ved					
	67 69			70	N		0		71	N	72	N 73		<u> </u>	74								80	
								Sec	ction	B: Fa	cility	Data												
incli City	ne and Location of Facility Inspected ade POTW name and NPDES permit of West Memphis WWTP			ustrial	l users	disch	hargi	ng to	POT	W, als	9	Entry Tin 1430 12/							nit Ef 2008		ive Da	te		
Wes	Rushing Rd. It Memphis, AR tenden Co.											Exit Time 1520 12/							nit Ex / 201 ;		ation D	ate		
	ne(s) of On-Site Representative(s)/Telrew Bass/Collection System	itle(s))/Pho	one and	d Fax	Numb	oer(s))									Oth	er Fac	cility	Data	a			
	ne, Address of Responsible Official/ n Rimmer/General Manager/870-7			ne and	Fax N	Numbe	er																	
City	of West Memphis WWTP . Box 1868	155-5	555										Con	tacted										
	st Memphis, AR 72303											Yes No V												
				(S - S	Satisfa							ring Inspe			unter	D.								
S	Permit	N	Fl	low M				_ 1 v1 tt1	Smar	M		erations &				1)	N	Sam	pling	!				
S	Records/Reports	N	Se	elf-Mo	nitori	ing Pı	rogra	am		N	Slu	dge Handl	ing/D	ispos	al	-	M	Pollu	ıtion	Pre	ventio	n		
N	Facility Site Review	N	C	ompli	ance S	Sched	lules			N	Pre	treatment					N	Mult	timed	lia				
N	Effluent/Receiving Waters	N	La	abora	tory					N	Sto	rm Water					N	Othe	er:					
		Se	ectio	n D: S	Summ	ary o	f Fin	dings	s/Con	nmen	ts (Att	ach additi	onal s	sheets	if ne	cessary	y)							
Cit	y is currently replacing pumps in	Stati	on #8	8 (Ma	in) an	d Sta	tion	#17.	Stati	ons ai	e bei	ng maintai	ned o	perat	ional	during	g cons	structi	ion w	ork				
	ere was an excess accumulation of er smaller solids that were visible					et we	ll of l	Pump	Stat	ion #	l 7. A 1	the time o	f the	inspe	ction	there	was a	shoe	and l	bask	ketball	along	with	
Th	ere were solids on the ground (rag	s and	l gre	ase ba	alls) at	t Pum	ıp St	ation	#8 (N	Main 1	Pumn	Station) th	at ha	ıd anı	oarer	ıtly hee	en ren	noved	duri	ing 1	րսյու	replac	ement.	
	(g	,	- 8				- r ~ ·		(-		-			F J		,				- 8 1		·		
Nar	ne(s) and Signature(s) of Inspector(s	s)								/Telep		Fax tal Quality	-Jone	shor)			Date	e					
Bre	nt L. Walker But L Walk	n						•				0) 935-471						Feb	ruary	y 4,	2009			
Sign	nature of Reviewer						Ago	ency/0	Office	e/Phor	e and	Fax Numb	ers					Dat	e					

	ADEQ Water NPDES Inspection	AFIN: «AFIN»		Permit #: «Pe i	rmit_»			
COLL	ECTION SYSTEM INSPECTI	ON AND OVER	RALL RATING		⊠s □	и 🗆 и	□NA	□NE
	IDE A BRIEF DESCRIPTION OF TH		SYSTEM:					
Combination gravity and force main system POPULATION SERVED/NUMBER OF RESIDENTIAL AND COMMERCIAL CONNECTIONS: Pop.: ~28,000								
FEET OF SEWER SYSTEM: Not Evaluated								
		<u>:u</u>						
)F SYSTEM: <u>Variable</u> THE SYSTEM EXPERIENCE PROF	DI EMO DI IDINO I	NOV OD WET WE	ATUED		<u> </u>		
(EXPL	AIN):_ Minor I&I					Y LIN	⊔NA	□NE
IS THE	RE A SYSTEM IN PLACE FOR RE	PORTING SSOS	TO ADEQ (DESCF	RIBE):	Q	Y 🗆 N	□NA	□NE
ARE A	LL SSOs REPORTED REGARDLES	SS OF SIZE:			Ø	Y □N	□NA	□NE
HAVE SSOs REACHED "WATERS OF THE STATE" (LIST DATE AND LOCATION OF EACH): All reported; see NPDES Enforcement Database				Ø	Y 🗆 N	□NA	□NE	
,	_				•			
PUMI	STATIONS				Øs □	и 🗆 и	□NA	□NE
NUMB	ER OF PUMP STATIONS IN SYSTE	EM: <u>43</u>	NUMBER WITH	BACKUP PO	WER: 43	*		
HOW	OFTEN ARE PUMP STATIONS INS	PECTED/MONITC	RED: Main statio	ons 6/wk; all	at least 2	<u>/wk</u>		
ARE M	IAINTENANCE RECORDS AND/OR	OPERATOR LOC	GS KEPT: Yes					
ADEQ	UATE INVENTORY OF SPARE PAR	RTS: <u>Yes</u>						
TYPE	OF REMOTE ELECTRONIC MONIT	ORING USED (I.E	E. SCADA OR AUT	O DIALERS	: SCADA	and/o	r Phor	<u>1e</u>
BRIEF conne	SUMMARY OF EMERGENCY PRO ctions	OCEDURES: *AII :	stations have ger	nerator and/o	or auxiliai	y pum	<u>p</u>	
NUMB	ER OF PUMP STATIONS VISITED	DURING INSPEC	TION (SEE ATTAC	CHED CHEC	KLISTS F	OR EA	CH): <u>4</u>	
SATE	ELLITE SYSTEMS				□s□ı	v □u	ØNA	□NE
DOES	THE COLLECTION SYSTEM RECE	IVE FLOW FROM	1 SATELLITE SYS	TEMS:				
TYPE(S) OF WASTE WATER RECEIVED:_								
– (O) OF WAOTE WATER REDEIVED.	_ LIKESIDENTIF	L LCOMMERCIA	AL LINDUS			Γ.	

NAME, ADDRESS AND PHONE NUMBER OF PERSON RESPONSIBLE FOR SATELLITE SYSTEM:

ANY KNOWN PROBLEMS WITH SATELLITE SYSTEM:

ADEQ Water NPDES Inspection	AFIN: « AFIN »	Permit #: «Permit_»

PUMP STATION VISIT (COMPLETE A SEPARATE CHECKLIST FOR EACH PUMP STATION VISITED)						
GENERAL INFORMATION AND OVERALL EVAL	□S ☑M □U □NA					
NAME AND/OR LOCATION OF PUMP STATION: Station #	8 – Main Station					
TYPE(S) OF WASTE WATER RECEIVED: MRESIDENTIAL	. ☑COMMERCIAL ☑INDUSTRIA	AL DOTHER:				
NUMBER OF PUMPS: 3	NUMBER OPERATIONAL: 2					
NUMBER AND SIZE OF PUMPS APPEARS ADEQUATE:		□S ☑M □U □NA □NE				
EVIDENCE OF RECENT OVERFLOWS OR HIGH LEVELS:		□Y ☑N □NA □NE				
Currently under construction for upgrades to pumps – is	being maintained operation du	ring construction.				
GENERAL OPERATION AND MAINTENANCE		□S ☑M □U □NA				
CLEAN AND WELL MAINTAINED WITH MINIMAL STORAGEQUIPMENT: Solids on ground (rags and grease remove	ed during construction)	□S ☑M □U □NA □NE				
GATES/DOORS/HATCHES/LIDS/ETC. LOCKED TO PREVE ACCESS AND/OR TAMPERING:		⊠S □M □U □NA □NE				
WET WELLS, SUMPS AND PITS ADEQUATELY COVERED PROTECTED:		⊠S □M □U □NA □NE				
ELECTRICAL CONTROLS COVERS CONDUIT AND EQUIF INSTALLED AND MAINTAINED:	PMENT PROPERLY	□S ☑M □U □NA □NE				
GUARDS AND SHIELDS IN PLACE AROUND MOVING EQUIDRIVESHAFTS, ETC.):	UIPMENT (BELTS, PULLEYS,	□S ☑M □U □NA □NE				
ADEQUATE VENTILATION TO PREVENT EXCESSIVE COL GASES AND FUMES:	NDENSATION AND/OR	⊠S □M □U □NA □NE				
ADEQUATE LIGHTING FOR ROUTINE INSPECTION/MAIN	TENANCE:	⊠S □M □U □NA □NE				
SEALS, VALVES AND PACKING ADEQUATELY MAINTAIN	ED TO PREVENT LEAKS:	☑S □M □U □NA □NE				
MINIMAL ACCUMULATION OF GREASE AND SOLIDS IN V	VET WELLS:	☑S □M □U □NA □NE				
BACKUP POWER AND ALARMS		☑S □M □U □NA				
PROVISIONS FOR GENERATOR AND/OR EMERGENCY T	RANSFER PUMP:	⊠S □M □U □NA □NE				
AUDIBLE/VISUAL ALARM WITH EMERGENCY CONTACT	INFORMATION POSTED:	☑S □M □U □NA □NE				
SCADA SYSTEM (LIST PARAMETERS MONITORED):		☑Y □N □NA □NE				

PUMP STATION VISIT (COMPLETE A SEPARATE CHECKLIST FOR EACH PUMP STATION VISITED)						
GENERAL INFORMATION AND OVERALL EVAI	ØS	□М	□U	□NA		
NAME AND/OR LOCATION OF PUMP STATION: Station #	±1 <u>0</u>					
TYPE(S) OF WASTE WATER RECEIVED: MRESIDENTIAL	☑COMMERCIAL ☑INDUSTRIA	AL DOTI	HER:			
NUMBER OF PUMPS: 3	NUMBER OPERATIONAL: 3					
NUMBER AND SIZE OF PUMPS APPEARS ADEQUATE:		Øs □	v □u	□NÆ	\ □NE	
EVIDENCE OF RECENT OVERFLOWS OR HIGH LEVELS:			Y ØN	□NA	□NE	
GENERAL OPERATION AND MAINTENANCE		⊠S	$\square M$	□U	$\square NA$	
CLEAN AND WELL MAINTAINED WITH MINIMAL STORAGE EQUIPMENT:		Øs □i	v □U	□NÆ	□NE	
GATES/DOORS/HATCHES/LIDS/ETC. LOCKED TO PREVE ACCESS AND/OR TAMPERING:		Øs 🗆	v □U	□NÆ	\ □NE	
WET WELLS, SUMPS AND PITS ADEQUATELY COVERED PROTECTED:), GRATED OR OTHERWISE	Øs □I	v □U	□NÆ	\ □NE	
ELECTRICAL CONTROLS COVERS CONDUIT AND EQUIF INSTALLED AND MAINTAINED:		Øs □i	v □U	□NÆ	□NE	
GUARDS AND SHIELDS IN PLACE AROUND MOVING EQ DRIVESHAFTS, ETC.) :	UIPMENT (BELTS, PULLEYS,	⊠s □i	v □u	□NÆ	NE	
ADEQUATE VENTILATION TO PREVENT EXCESSIVE CO GASES AND FUMES:	NDENSATION AND/OR	⊠s □i	v □U	□NA	□NE	
ADEQUATE LIGHTING FOR ROUTINE INSPECTION/MAIN	TENANCE:	Øs □i	v □U	□NÆ	\ □NE	
SEALS, VALVES AND PACKING ADEQUATELY MAINTAIN	ED TO PREVENT LEAKS:	Øs □I	v □U	□NA	\ □NE	
MINIMAL ACCUMULATION OF GREASE AND SOLIDS IN V	VET WELLS:	Øs □	v □U	□NÆ	□NE	
BACKUP POWER AND ALARMS		ØS		□U	□NA	
PROVISIONS FOR GENERATOR AND/OR EMERGENCY T	RANSFER PUMP:	Øs □i	v □U	□NA	\ □NE	
AUDIBLE/VISUAL ALARM WITH EMERGENCY CONTACT	INFORMATION POSTED:	Øs □I	v □u	□NA	\ □NE	
SCADA SYSTEM (LIST PARAMETERS MONITORED):		1	Y DN	□NA	\ □NE	

ADEQ Water NPDES Inspection	AFIN: « AFIN »	Permit #: «Permit_»

PUMP STATION VISIT (COMPLETE A SEPARATE CHECKLIST FOR EACH PUMP STATION VISITED)						
GENERAL INFORMATION AND OVERALL EVAL		M DU	□NA			
NAME AND/OR LOCATION OF PUMP STATION: Station #	<u>17</u>					
TYPE(S) OF WASTE WATER RECEIVED: MRESIDENTIAL	. ☑COMMERCIAL ☑INDUSTRIA	AL OTHE	R:			
NUMBER OF PUMPS: 2	NUMBER OPERATIONAL: 1					
NUMBER AND SIZE OF PUMPS APPEARS ADEQUATE: 1	New pump not ready yet	□S ØM I	□U □N	A □NE		
EVIDENCE OF RECENT OVERFLOWS OR HIGH LEVELS:		□Y	⊿ N □N	A □NE		
GENERAL OPERATION AND MAINTENANCE			M DU	□NA		
CLEAN AND WELL MAINTAINED WITH MINIMAL STORAG EQUIPMENT:		⊠s □m ∣	□U □N	A □NE		
GATES/DOORS/HATCHES/LIDS/ETC. LOCKED TO PREVE ACCESS AND/OR TAMPERING:		⊠S □M	⊐U □N	A □NE		
WET WELLS, SUMPS AND PITS ADEQUATELY COVERED PROTECTED:		⊠S □M ∣	⊐U □N	A □NE		
ELECTRICAL CONTROLS COVERS CONDUIT AND EQUIP INSTALLED AND MAINTAINED:		⊠s □m	⊐U □N	A □NE		
GUARDS AND SHIELDS IN PLACE AROUND MOVING EQUIDRIVESHAFTS, ETC.):	UIPMENT (BELTS, PULLEYS,	⊠S □M	□U □N	A □NE		
ADEQUATE VENTILATION TO PREVENT EXCESSIVE CONGASES AND FUMES:	NDENSATION AND/OR	⊠s □m	□U □N	A □NE		
ADEQUATE LIGHTING FOR ROUTINE INSPECTION/MAIN	TENANCE:	⊠S □M	□U □N	A □NE		
SEALS, VALVES AND PACKING ADEQUATELY MAINTAIN	ED TO PREVENT LEAKS:	ØS □M I	□U □N	A □NE		
MINIMAL ACCUMULATION OF GREASE AND SOLIDS IN V shoe and basketball in wet well	VET WELLS: <u>Large solids -</u>	□S ØM I	□U □N	A □NE		
BACKUP POWER AND ALARMS		Øs □	M DU	□NA		
PROVISIONS FOR GENERATOR AND/OR EMERGENCY T	RANSFER PUMP:	⊠S □M	JU DN	A □NE		
AUDIBLE/VISUAL ALARM WITH EMERGENCY CONTACT I	INFORMATION POSTED:	⊠S □M I	⊐U □N	A □NE		
SCADA SYSTEM (LIST PARAMETERS MONITORED):		✓Y	⊐N □N	A □NE		

ADEQ Water NPDES Inspection	AFIN: « AFIN »	Permit #: «Permit_»

PUMP STATION VISIT (COMPLETE A SEPARATE CHECKLIST FOR EACH PUMP STATION VISITED)							
GENERAL INFORMATION AND OVERALL EVAL	ØS	□М	□U	□NA			
NAME AND/OR LOCATION OF PUMP STATION: Station #	<u>16</u>						
TYPE(S) OF WASTE WATER RECEIVED: MRESIDENTIAL	. ☑COMMERCIAL ☐INDUSTRIA	AL DOT	HER:				
NUMBER OF PUMPS:_1	NUMBER OPERATIONAL: 1						
NUMBER AND SIZE OF PUMPS APPEARS ADEQUATE:		Øs □	M □U		\ □NE		
EVIDENCE OF RECENT OVERFLOWS OR HIGH LEVELS:			Y ØN	□NA	\ □NE		
Small lift with single submerged pump in manhole.							
GENERAL OPERATION AND MAINTENANCE		ØS	□М	□U	□NA		
CLEAN AND WELL MAINTAINED WITH MINIMAL STORAG EQUIPMENT:	E OF UNRELATED	□s□	м □∪	ØNÆ	□NE		
GATES/DOORS/HATCHES/LIDS/ETC. LOCKED TO PREVE ACCESS AND/OR TAMPERING:		Øs 🗆	M □U	□NA	NE		
WET WELLS, SUMPS AND PITS ADEQUATELY COVERED PROTECTED:		Øs 🗆	M □U	□NA	NE		
ELECTRICAL CONTROLS COVERS CONDUIT AND EQUIP INSTALLED AND MAINTAINED:	PMENT PROPERLY	Øs 🗆	м 🗆	□NA	NE		
GUARDS AND SHIELDS IN PLACE AROUND MOVING EQUIDRIVESHAFTS, ETC.):	UIPMENT (BELTS, PULLEYS,	□s□	M □U	ØNÆ	NE		
ADEQUATE VENTILATION TO PREVENT EXCESSIVE COL GASES AND FUMES:	NDENSATION AND/OR	□s□	M □U	ØN₽	\ □NE		
ADEQUATE LIGHTING FOR ROUTINE INSPECTION/MAIN	TENANCE:	□s □	M □U	ØNÆ	\ □NE		
SEALS, VALVES AND PACKING ADEQUATELY MAINTAIN	ED TO PREVENT LEAKS:	□s □	м 🗆	ØNÆ	\ □NE		
MINIMAL ACCUMULATION OF GREASE AND SOLIDS IN V	VET WELLS:	Øs □	м □∪		\ □NE		
BACKUP POWER AND ALARMS		ØS	□М	□U	□NA		
PROVISIONS FOR GENERATOR AND/OR EMERGENCY T	RANSFER PUMP:	Øs 🗆	м □∪		\ □NE		
AUDIBLE/VISUAL ALARM WITH EMERGENCY CONTACT	INFORMATION POSTED:	Øs □	M □U	□NA	□NE		
SCADA SYSTEM (LIST PARAMETERS MONITORED):			Y ØN	□NA	□NE		
	·						



WEST MEMPHIS UTILITY COMMISSION

604 East Cooper P O Box 1868 West Memphis, AR 72301

Phone: 870-735-3355 Fax: 870-732-7623

7623 1 9 2009

February 18, 2009

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

Re: Sanitary Sewer Overflow Inspection

AFIN: 18-00109 NPDES Permit No.: AR0022039

This letter is to address the violations found during the inspection on December 22, 2008.

1. There was an excess accumulation of large solids in the wet well of Pump Station #17. At the time of the inspection there was a shoe and basketball along with other smaller solids that were visible in the wet well.

The wet well at Pump Station #17 was vacuumed out and cleaned on February 17, 2009. All the larger solids were disposed of.

2. There were solids on the ground (rags and grease balls) at Pump Station #8 (Main Pump Station) that had apparently been removed during pump replacement.

All of the debris was picked up and disposed of on February 17, 2009.

If I can be of further assistance, please contact me at 870-702-5103.

Sincerely,

John Rimmer General Manager



March 23, 2009

John Rimmer
West Memphis, City of
Wastewater Treatment Plant
P.O. Box 1868, 604 East Cooper
West Memphis, AR 72301

RE: NPDES Permit AR0022039, AFIN 18-00109

Response to Inspection

Dear Mr. Rimmer:

ADEQ has received your response to the December 22, 2008 routine compliance inspection and Sanitary Sewer Overflow Inspection of your facility by our District Field Inspector, Brent Walker. Your letter appears to adequately address the discrepancies identified during the visit.

The Department will keep the inspection and response on file and will consider them as required by the Pollution Control and Ecology Commission Regulation No. 7, Civil Penalties. This regulation requires ADEQ to consider the past history of your company and how expeditiously the violations were addressed in determining any civil penalty that may be necessary for any violations.

Thank you for your attention to this matter. If we need further information, we will contact you. Should you have any questions, feel free to contact me by phone at 501-682-0632 or e-mail at robertsa@adeq.state.ar.us. In any written correspondence to this Department, please refer to NPDES Permit AR0022039 and AFIN 18-00109.

Sincerely,

Anne Roberts

Enforcement Administrator

Enforcement Branch

Water Division