

June 30, 2009

Barrett Harrison, Mayor Blytheville WWTP - West P.O. Box 1784 Blytheville, AR 72315

**RE: WWTP Inspection - West** 

AFIN: 47-00145 NPDES Permit No.: AR0022560

Dear Mr. Harrison:

On May 19, 20, and 21, 2009, 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.
  - a. There was an excessive accumulation of solids (rags, plastic, etc) in the weir troughs of the clarifiers.
  - **b.** There was an excessive accumulation of solids in the polishing pond.
- 2. Improper 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

«Cognizant\_Official», «Facility\_Name» June 26, 2009 Page 2

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.

- a. The results for FCB (Fecal Coliform Bacteria) were not being calculated correctly. When multiple filtered volumes yield results meeting the 20-60 rule, all of these results must be used in determining the reported CFU/100ml. The current method of using the result of the highest volume meeting the 20-60 rule is incorrect.
- b. No Laboratory Control Charts, you should consult Standard Methods 1020 B. 12 for information related to creating the proper charts for each parameter.
- 3. Non-representative sampling; this violates Part II Section C:1. of the permit. Samples and measurements taken as required herein shall be representative of the volume and nature of the monitored discharge during the entire monitoring period. All samples shall be taken at the monitoring points specified in this permit and, unless otherwise specified, before the effluent joins or is diluted by any other waste stream, body of water, or substance. Monitoring points shall not be changed without notification to and the approval of the Director. Intermittent discharges shall be monitored. A review of sampling data indicates that the sampling of days with higher than normal flows tend to be avoided. Specifically, sampling was not conducted on the days immediately following the heavy rainfall on May 9 and 10, 2009 in which flow was in excess of 4 times normal flow for the facility.

In addition to the above items, you should continue to comply with the conditions of the current CAO (08-094). In particular the sludge storage lagoons and backup power provisions are still in need of attention.

The above items require your immediate attention. Please submit a written response to these findings to Cindy Garner, Water Division Enforcement Branch Manager, of this Department. This response should be mailed to the address below. This response should contain documentation describing the course of action taken to correct each item noted. This corrective action should be completed as soon as possible, and the written response is due by **July 10, 2009**.

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

«Cognizant\_Official», «Facility\_Name» June 26, 2009 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, Bred & Walter

Brent L. Walker District 3 Field Inspector Water Division

cc: Water Division Enforcement Branch Water Division Permits Branch

≎EPA										Form Approved OMB No. 2040-0003			
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		tio	n I	Report									
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Transaction Code         NPDES           1         N         2         5         3         A         R         0         0         2         2         5	<b>6 0</b> 11	12	0		1	9	17	Insj 18	pec. T	ypeInspectorFac. Type19 $\mathbf{S}$ 20 $1$			
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Inspection Work Days Facility Evaluation	Rating	BI	(	QA				i	Reserv	/ed			
67 <u>69</u> 70 <u>1</u>	71	Ν	72	<b>N</b> 73		74	75			80			
SEPA       OMB No. 2040-0003         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       Inspector       Fac. Type         1       N       2       5       6       0       11       12       0       9       0       5       1       9       17       18       C       19       S       20       1         Remarks         Inspection Work Days       Facility Evaluation Rating       B1       QA													
include POTW name and NPDES permit number) Blytheville WWTP - West	)9												
Blytheville, AR	)9												
James Yankee/Pretreatment Coordinator/870-763-4961 Tam	Oth	ier Fac	cility Data										
Barrett Harrison/Mayor/870-763-3602 Blytheville WWTP - West P.O. Box 1784	Name, Address of Responsible Official/Title/Phone and Fax Number       Barrett Harrison/Mayor/870-763-3602         Bytheville WWTP - West       Contacted         P.O. Box 1784       V												
Blytheville WWTP - West P.O. Box 1784 Blytheville, AR 72315 Section C: Areas Evaluated During Inspection													
S Permit S Flow Measurem	ent	U	Ope	erations & M	lainten	ance		U	Samj	pling			
S Records/Reports U Self-Monitoring	Program	Ν	Slu	dge Handling	g/Dispo	sal		Ν	Pollu	ition Prevention			
Tacinity Site Keview Compliance Sen	edules		Pre	treatment					Mult	timedia			
Endent/Receiving Waters Eaboratory	of Findings/Con				al shoo	te if n	COSSOR		Othe	er:			
A small discrepancy was found in the calculation of dilution corrected. Due to a severe ice storm in late January 2009, the facility w A NCR was submitted to the Enforcement Branch and no fu The facility is currently under a CAO (08-094) with the Depa	factors for CBOE as out of power du rther action is rec	), no si uring la	gnifi at e J	cant impact t January and	to final	result	s was i	noted					
	Agency/Office/	Teleph	ione/	Fax					Date	2			
Brent L. Walker Brest L Walter	AR Dept. of E	nviron	ment	tal Quality-Jo		ro							
Signature of Reviewer	Agency/Office	/Phone	and	Fax Numbers	5				Dat	e			

ADEQ Water NPDES Inspection	AFIN: «AFIN»	Permit #: « <b>Permit_</b> »
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SECTION A: PERMIT VERIFICATION	
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS	Øs 🗆m 🗇u 🖾na 🗇ne
DETAILS:	
1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE:	
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES:	
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT:	
4. ALL DISCHARGES ARE PERMITTED:	
SECTION B: RECORDKEEPING AND REPORTING EVALUATION	
RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT	
DETAILS:	
1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS:	
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE:	
a. DATES AND TIME(S) OF SAMPLING:	
b. EXACT LOCATION(S) OF SAMPLING:	
c. NAME OF INDIVIDUAL PERFORMING SAMPLING:	
d. ANALYTICAL METHODS AND TECHNIQUES:	
e. RESULTS OF CALIBRATIONS:	
f. RESULTS OF ANALYSES:	
g. DATES AND TIMES OF ANALYSES:	
h. NAME OF PERSON(S) PERFORMING ANALYSES:	
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE:	
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR:	
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA:	
SECTION C: OPERATIONS AND MAINTENANCE	
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED	
DETAILS:	
1. TREATMENT UNITS PROPERLY OPERATED:	
2. TREATMENT UNITS PROPERLY MAINTAINED: Excessive solids in clarifier weir troughs and polishing pond	
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED:	
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE:	
5. ALL NEEDED TREATMENT UNITS IN SERVICE:	
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED:	
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED:	
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE:	
9. STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED:	
10. PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED:	
11. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR:	
12. IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED:	
<ol> <li>IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED:</li> <li>HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS:</li> </ol>	Øy 🗆n 🗆na 🗇ne
12. IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED:	

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SECTION D: SAMPLING	
PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS	
DETAILS:	
1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT:	🗹 y 🗆 n 🗆 na 🗆 ne
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES:	🗹 y 🗆 n 🗆 na 🗇 ne
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT:	🗹 Y 🗆 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: High flow not sampled	Dy 🗹n Ona One
6. SAMPLE COLLECTION PROCEDURES ADEQUATE:	Øy 🛛 n 🖓 na 🖓 ne
a. SAMPLES REFRIGERATED DURING COMPOSITING:	🗹 y 🗆 n 🗆 na 🗆 ne
b. PROPER PRESERVATION TECHNIQUES USED:	🗹 Y 🗆 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
SECTION E: FLOW MEASUREMENT	
PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS	S DM DU DNA DNE
DETAILS:	· ·
1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: TYPE OF DEVICE: 28" Rectangu	
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED:	Øy 🛛 n 🖓 na 🖓 ne
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED:	Øy 🛛 n 🖓 na 🖓 ne
4. CALIBRATION FREQUENCY ADEQUATE:	Øy 🛛 n 🖓 na 🖓 ne
5. RECORDS MAINTAINED OF CALIBRATION PROCEDURES:	Øy 🛛 n 🖓 na 🖓 ne
6. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE:	Øy 🛛 n 🖓 na 🖓 ne
7. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE:	Øy 🛛 n 🖓 na 🖓 ne
8. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES:	Øy 🛛 n 🖓 na 🖓 ne
9. HEAD MEASURED AT PROPER LOCATION:	Øy 🛛 n 🖓 na 🖓 ne
SECTION F: LABORATORY	
PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS	
DETAILS: Improper calculation of FCB results; No control charts	
1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(B) FOR SLUDGES) :	DY 🗹 N 🗆 NA 🗆 NE
2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED:	Dy On Øna One
3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT:	🗹 y 🗆 n 🗆 na 🗆 ne
4. QUALITY CONTROL PROCEDURES ADEQUATE: No control charts	Dy 🗹n Ona One
5. DUPLICATE SAMPLES ARE ANALYZED >10% OF THE TIME:	🗹 Y 🗆 N 🗆 NA 🗆 NE
6. SPIKED SAMPLES ARE ANALYZED $\geq$ 10% OF THE TIME:	🗹 Y 🗆 N 🗆 NA 🗆 NE
7. COMMERCIAL LABORATORY USED:	🗹 y 🗆 n 🗆 na 🗆 ne
a. LAB NAME: <u>ETC</u>	
b. LAB ADDRESS: Memphis, TN	
c. PARAMETERS PERFORMED: Biomonitoring	
8. BIOMONITORING PROCEDURES ADEQUATE:	
a. PROPER ORGANISMS USED:	
b. PROPER DILUTION SERIES FOLLOWED:	
c. PROPER TEST METHODS AND DURATION:	
d. RETESTS AND/OR TRE PERFORMED AS REQUIRED:	

ADEQ Water NPDES Inspection
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SECTION	G: EFFLUE	NT/RECEIVIN	G WATERS	OBSERVATIO	ONS						
BASED ON	VISUAL OBS	ERVATIONS C	NLY			⊠s ⊡m ⊏					
DETAILS:											
OUTFALL #:	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	COLOR	OTHER				
001	None	None	Low	None	None	Lt. Green					
							·				
SECTION	H: SLUDGE	DISPOSAL									
SLUDGE D	ISPOSAL MEE	ETS PERMIT R	EQUIREMEN	ſS		🗆 s 🗆 м 🗆	U ⊠NA ⊡NE				
DETAILS:	No Sludge Disp	osal – Facility	stores sludge i	n old lagoon							
1. SLUDGE M	ANAGEMENT ADEQU	ATE TO MAINTAIN EFF	FLUENT QUALITY:			🗆 s 🗆 🛛	DU ØNA DNE				
2. SLUDGE R	ECORDS MAINTAINED	O AS REQUIRED BY 40	CFR 503:			🗆 s 🗆 🛛	□u Øna □ne				
3. FOR LAND	APPLIED SLUDGE, TY	PE OF LAND APPLIE	D TO: (E.G., FOREST,	AGRICULTURAL, PUE	BLIC CONTACT SITE):						
SECTION	I: SAMPLIN	G INSPECTIO	ON PROCEDU	JRES							
SAMPLE R	ESULTS WITH	IIN PERMIT RI	EQUIREMENT	S			U 🗹 NA 🗆 NE				
DETAILS:											
1. SAMPLES	OBTAINED THIS INSPE	ECTION:				□ Y					
2. TYPE OF S	AMPLE: GRAB:		IETHOD: FREQUE	NCY:							
3. SAMPLES	PRESERVED:										
4. FLOW PRC	PORTIONED SAMPLE	S OBTAINED:									
3.     SAMPLES PRESERVED:       4.     FLOW PROPORTIONED SAMPLES OBTAINED:       5.     SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE:											
6. SAMPLE R	EPRESENTATIVE OF	OLUME AND NATURE	E OF DISCHARGE:								
DETAILS:         1. SAMPLES OBTAINED THIS INSPECTION:         2. TYPE OF SAMPLE: □GRAB:_ □COMPOSITE:_ METHOD:_ FREQUENCY:         3. SAMPLES PRESERVED:         4. FLOW PROPORTIONED SAMPLES OBTAINED:         5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE:         6. SAMPLE REPRESENTATIVE OF VOLUME AND NATURE OF DISCHARGE:         7. SAMPLE SPLIT WITH PERMITTEE:         8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED:         9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT:											
8. CHAIN-OF-	CUSTODY PROCEDU	RES EMPLOYED:									
SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS       IS       IM       IU       ØNA       INE         DETAILS:       No Sludge Disposal – Facility stores sludge in old lagoon       IS       IM       IU       ØNA       INE         1.       SLUDGE MANAGEMENT ADEQUARE TO MAINTAIN EFLUENT GUALITY:       IS       IM       IU       ØNA       INE         2.       SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503:       IS       IM       IU       ØNA       INE         3.       FOR LAND APPLIED SLUDGE, TYPE OF LAND APPLIED TO:       (E.G., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE):       SIM       IU       ØNA       INE         SECTION 1: SAMPLING INSPECTION PROCEDURES         SAMPLE RESULTS WITHIN PERMIT REQUIREMENTS         DETAILS:       IYPE OF SAMPLE:       IY       IV       IN       INA       INE         2.       TYPE OF SAMPLE:       IGRAB:       ICOMPOSITE:       METHOD:       FREQUENCY:         3.       SAMPLES DETAINED THIS INSPECTION:       IV       IN       INA       INE         2.       TYPE OF SAMPLE:       IV       IN       INA       INE         3.       SAMPLES DETAINED THIS INSPECTION:       IV       IN       INA       INE         4.       FLOW PROPOR											
OUTFALL#:       OIL SHEEN       GREASE       TURBIDITY       VISIBLE FOAM       FLOATING SOLIDS       COLOR       OTHER         001       None       None       Low       None       None       LL Green       -         001       None       Low       None       None       LL Green       -       -         001       Image: Standard Standa											
						Øs 🗆 M 🗆					
DETAILS:	Facility meets t	he requirement	s of the No Ex	posure Exclusion	<u>on</u>						
1. SWPPP UP	DATED AS NEEDED:	DATE OF LAST UP	DATE:								
2. SITE MAP I	NCLUDING ALL DISCH	HARGES AND SURFAC	E WATERS:								
3. POLLUTION	N PREVENTION TEAM	IDENTIFIED:									
4. POLLUTION	N PREVENTION TEAM	PROPERLY TRAINED	:								
5. LIST OF PC	TENTIAL POLLUTANT	SOURCES:									
		ARGES ARE AUTHOR	IZED:								
8. LIST OF ST	RUCTURAL BMPS:										
11. INSPECTIC	OF SAMPLE:       GRAB:       COMPOSITE:       METHOD:       FREQUENCY:         LES PRESERVED:       IY       IN       MA       IN         PROPORTIONED SAMPLES OBTAINED:       IY       IN       MA       IN         LE OBTAINED FROM FACILITY'S SAMPLING DEVICE:       IY       IN       MA       IN         LE OBTAINED FROM FACILITY'S SAMPLING DEVICE:       IY       IN       MA       IN         LE REPRESENTATIVE OF VOLUME AND NATURE OF DISCHARGE:       IY       IN       MA       IN         LE SPLIT WITH PERMITTEE:       IY       IN       MA       IN         +OF-CUSTODY PROCEDURES EMPLOYED:       IY       IN       MA       IN         LES COLLECTED IN ACCORDANCE WITH PERMIT:       IY       IN       MA       IN         ON J:       STORM WATER POLLUTION PREVENTION PLAN       IN       INA       IN         NWATER MANAGEMENT MEETS PERMIT REQUIREMENTS       IY       IN       INA       IN         S:       Facility meets the requirements of the No       Exposure Exclusion       IY       IN       INA       IN         PUPDATED AS NEEDED:										

ADEQ Water NPDES Inspection

AFIN: «AFIN»

Permit #: «Permit\_»

		FLOW CAL	CULAT	ION	SHEET		
		-					
Date: 5/1	9/2009	Time: <b>1444</b>	-				
Head in Ind	ches: N/A*	Feet:	N/A*				
			NA				
Type & Siz	e of Primary Flow	Measureme	ent Devi	ce:			
28" Recta	ngular weir witho	out end con	tractior	าร			
Name & M	odel of Secondary	/ Flow Meas	uremen	t Dev	/ice: Po	lysonic	Transducer
Date of las	t Calibration of Se	econdary Flo	w Devic	ce:	6/25/200	8	
		<i>y</i>				•	
Recorded I	Flow at Date & Tir	me Listed Ab	ove:	734		(F	Facility Flow Meter)
Coloulated	Flow at Date & T	imaliatad A		694	*		
	ted using flow charts in:					book-5 <sup>th</sup> Edi	(Facility Cal. Chart)
	tied doing now charts in.			<u>ivicasu</u>			
% Error =	Recorded Value	e - Calcu	X 100				
76 LIIUI =	Calc	culated Value	× 100				
	704						
% Error =	734	-	694		X 100		
		694					
	40	X 400					
% Error =	694	─ X 100  -					
% Error =	0.058	X 100					
% Error =	5.8	%					
76 EITOT =	5.0	70					
Comments	:						
	-						

ADEQ Water NPDES	Inspection	AFI	N: «AFIN»		Pe	Permit #: <b>«Permit_»</b>						
		DI	MR Calculat	tion Che	ck							
<b>Reporting Period:</b>	From _	09 Year	03 Month	01 Day	_ To	09 Year	03 Month	<u>31</u> Day				
Parameter Checked	:	TSS	_									
	]	Loading Mass		<b>Concentration</b> <b>Monthly</b>								
	Mo. A	vg lbs	/day	Mo. A	vg	mg/l	7-day Avg mg/l					
<b>Reported Value:</b>		69.4			7.7		16					
Calculated Value:		69.4			7.7		16					
Permit Value:		375			30		45					

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

ADEQ Water NPDES	Inspection	AFI	N: «AFIN»		Pe	Permit #: <b>«Permit_»</b>					
		DI	MR Calculat	ion Che	ck						
<b>Reporting Period:</b>	From _	09 Year	03 Month	01 Day	_ To	09 Year	03 Month	<u>31</u> Day			
Parameter Checked	: <u>B</u>	SOD5	_								
		oading Mass		Concentration Monthly							
	Mo. A	vg lbs	/day	Mo. A	vg	mg/l	7-day Avg	g mg/l			
<b>Reported Value:</b>		19.2			2.0		2.3				
Calculated Value:		19.2			2.0		2.3				
Permit Value:		313			25		38				

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



Barrett Harrison

CITY COUNCIL: Ray L. Jones Shirley Conneally Shirley Overman Monte Hodges Mylas Jeffers Carol White

ATTORNEY: Mike Bearden

PUBLIC UTILITIES DIRECTOR: Rick Mosley

SUPERINTENDENT: Kenneth Ellis Blytheville Wastewater Dept.

P.O. Box 1784 Blytheville, AR 72316-1784

Phone:(870) 763-4961 Fax: (870) 763-8541

July 10, 2009

Cindy Garner ADEQ Water Division 5301 Northshore Drive North Little Rock, AR 72118-5317

Re: WWTP Inspection Response - North

Re: AFIN: 47-00145

NPDES Permit No: AR0022586

Dear Ms. Garner:

Enclosed are the responses to the inspection conducted by Brent Walker on May 19, 20, and 21, 2009.

- At the time of inspection the clarifier weirs were in need of cleaning.
   (a) We will begin cleaning the clarifier weirs 3 times per week or more if needed.
- 2. The results for FCB (Fecal Coliform Bacteria) were not being calculated correctly.

(a) Lab Technician was instructed to use the correct method for accurately calculating the fecal coliform bacteria.

#### 3. No Laboratory Control Charts.

(a) We have begun using related charts from Standard Methods 1020 B.

If you have further questions or need more information, please call me at (870) 763-4961.

Sincerely,

Jankee

James Yankee Pretreatment Coordinator





Barrett Harrison

CITY COUNCIL: Ray L. Jones Shirley Conneally Shirley Overman Monte Hodges Mylas Jeffers Carni White

ATTORNEY: Mike Bearden

PUBLIC UTILITIES DIRECTOR: Rick Mosley

SUPERINTENDENT: Kenneth Ellis Blytheville Wastewater Dept.

P.O. Box 1784 Blytheville, AR 72316-1784

> Phone:(870) 763-4961 Fax: (870) 763-8541

> > July 10, 2009

Cindy Garner ADEQ Water Division 5301 Northshore Drive North Little Rock, AR 72118-5317

Re: WWTP Inspection Response - South

Re: AFIN: 47-00145

NPDES Permit No: AR0022578

Dear Ms. Garner:

Enclosed are the responses to the inspection conducted by Brent Walker on May 19, 20, and 21, 2009.

#### 1. At the time of inspection the clarifier weirs were in need of cleaning.

(a) We will begin cleaning the clarifier weirs 3 times per week or more if needed.

2. The results for FCB (Fecal Coliform Bacteria) were not being calculated correctly.

(a) Lab Technician was instructed to use the correct method for accurately calculating the fecal coliform bacteria.

### 3. No Laboratory Control Charts.

(a) We have begun using related charts from Standard Methods 1020 B.

## 4. Non-representative sampling.

(a) Mr. Walker is referring to the Fecal Coliform samples only. These are grabbed by hand from a platform inside the effluent channel. During this event the water level was above this platform hindering operators in collecting these samples safely. We will collect these samples regardless of flow through our effluent channel. I have attached a spread sheet for the South and West plants showing the sampling discrepancy.

If you have further questions or need more information, please call me at (870) 763-4961.

Sincerely,

alle

James Yankee Pretreatment Coordinator

MAYOR: Barrett Harrison

> CITY COUNCIL: Ray L. Jones Shirley Conneally Shirley Overman Monte Hodges Mylas Jeffers Carol White

ATTORNEY: Mike Bearden

PUBLIC UTILITIES DIRECTOR: Rick Mosley

SUPERINTENDENT: Kenneth Ellis Blytheville Wastewater Dept.

P.O. Box 1784 Blytheville, AR 72316-1784

> Phone:(870) 763-4961 Fax: (870) 763-8541

> > July 10, 2009

Cindy Garner ADEQ Water Division 5301 Northshore Drive North Little Rock, AR 72118-5317

Re: WWTP Inspection Response - West

Re: AFIN: 47-00145

NPDES Permit No: AR0022560

Dear Ms. Garner:

Enclosed are the responses to the inspection conducted by Brent Walker on May 19, 20, and 21, 2009.

# 1. There was an excessive accumulation of solids (rags, plastic, etc) in the weir troughs of the clarifiers.

(a) This was caused by the brushes on the barscreen not working properly and allowing the screen to become blocked, allowing solid material to pass over the weir plate and into the aeration basin accumulating into the clarifiers and then into the weir troughs. The barcreen brushes have been replaced and is working properly and is removing the majority of trash from entering the treatment plant. Trash in the clarifiers and weir troughs will be removed daily.

# 2. There was an excessive accumulation of solids in the polishing pond.

(a) The accumulation of solids in the polishing was a result of the sludge returns being clogged with trash buildup and being blown out with a high pressure water jet. The solids in the polishing pond will be pumped into the aeration basin.

# 3. There results for FCB (Fecal Coliform Bacteria) were not being calculated correctly.

(a) Lab Technician was instructed to use the correct method for accurately calculating the fecal coliform bacteria.



## 4. No Laboratory Control Charts.

(a) We have begun using related charts from Standard Methods 1020 B.

### 5. Non-representative sampling.

(a) Mr. Walker is referring to the Fecal Coliform samples only. These are grabbed by hand from a platform inside the effluent channel. During this event the water level was above this platform hindering operators in collecting these samples safely. We will collect these samples regardless of flow through our effluent channel. I have attached a spread sheet for the South and West plants showing the sampling discrepancy.

If you have further questions or need more information, please call me at (870) 763-4961.

Sincerely,

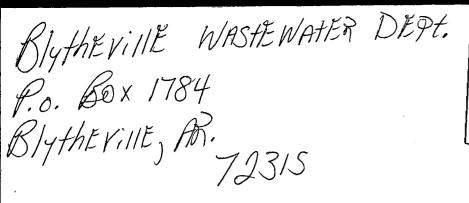
6.

Hanked-

James Yankee Pretreatment Coordinator

PLAN		South			MONT		MAY		YEAR	2009		FECALS	7-Day	7-Day	7-Day	7-Day
DATE	FLOW	EFFLUENT		1		CBOD5		TSS		NH3-N		COLONY	AVG.	AVG.	AVG.	AVG.
	MGD	p.H.	D.O.	TEMP.	MLSS	LBS.	MG/L	LBS.	MG/L	LBS.	MG/L	COUNT	BOD5	TSS	NH3-N	Fecal
1	2.283	7.10	7.8	20.9	210								2.0	2.6	0.6	15
2	1.676															
3	1.661															
4	1.538	7.50	8.0	18.1	270							142				
5	1.076	7.10	8.1	18.5	340	12.6	1.4	17.9	2	2.7	0.3	30				
6	2.526	7.50	7.6	19.5	330	42.1	2	42.1	2	6.3	0.3	380				117
7	1.463	7.50	8.7	19.7	70	8.6	0.7	12.2	1	6.1	0.5		1.4	1.7	0.4	
8	1.169	7.50	7.7	21.4	290											
9	3.676		8.2	21.2												
10	3.280		7.3	20.8												
11	2.276	7.40	7.7	19.4												
12	1.576	7.30	7.5	19.5	700	28.9	2.2	26.3	2	15.8	1.2					
13	1.246	7.50	8.4	20.6	200	20.8	2	20.8	2	2.1	0.2	167				
14	1.412	7.50	9.0	21.7	150	15.3	1.3	11.8	1	2.4	0.2	60		1.7	0.5	
15	1.124	7.40	8.0	22.4								292				143
16	0.996															
17	0.850															
18	0.877	7.60	8.7	20.2	530							<2				
19	0.795	7.50	8.1	20.5	450	11.3	1.7	13.2	2	2	0.3	23				
20	0.784	7.60	8.6	21.1	690	10.5	1.6	13.1	2	2.6	0.4	140				19
21	0.777	7.70	8.6	22.2	150	12.3	1.9	25.9	4	1.3	0.2		1.7	2.7	0.3	
22	0.720	7.50	8.8	23.1	1400											
23	0.731		8.0	23.6												
24	1.771		7.8	23.3												
25	2.811		7.2	22.4												
26	1.651	7.40	7.4	23	600	17.9	1.3	55.1	4	2.8	0.2	456				
27	1.428	7.30	7.8	23.7	670	20.2	1.7	47.6	4	3.6	0.3	520				
28	1.052	7.50	8.1	23.9	600	14.9	1.7	26.3	3	2.6	0.3	380		3.7	0.3	
29	0.931	7.60	8.1	23.3	540											448
30	0.857															
31	0.818															
AVG.	1.478				455		1.6		2.4		0.4		AVG.			
MAX.	3.676	7.70				18.0		26.0		4.2			MAX.	CU mg/L		
MIN.		7.10	7.2										MIN.			

PLAN	1	West			MONTI		MAY		YEAR	2009		FECALS	7-Day	7-Day	7-Day	7-Day
DATE	FLOW		EFFLUENT	1		CBOD5		TSS		NH3-N		COLONY	AVG.	AVG.	AVG.	AVG.
	MGD	p.H.	D.O.	TEMP.	MLSS	LBS.	MG/L	LBS.	MG/L	LBS.	MG/L	COUNT	BOD5	TSS	NH3-N	Feca
1	2.518	7.10	7.4	20.7									5.8	8.3	4.6	195
2	2.020															
3	1.739															
4	1.543	7.40	7.8	18.3	380							580			and the second	
5	1.163	7.50	8.2	18.9	910	31	3.2	48.5	5	47.5	4.9	288				
6	2.442	7.30	7.4	20.1	1150	67.2	3.3	40.7	2	99.8	4.9	700				
7	1.395	7.20	10.4	20.2	950	29.1	2.5	11.6	1	51.2	4.4	92	3.0	2.7	4.7	322
8	1.262	7.60	8.6	21.7	870											
9	4.266		7.8	21												
10	4.978		7.1	21.2												
11	4.757	7.30	8.3	19.3											1.1	
12	1.703	7.30	7.0	19.9	580	81	5.7	255.7	18	35.5	2.5					
13	1.357	7.50	9.2	20.9	820	49.8	4.4	113.2	10	48.7	4.3	350				
14	1.574	7.40	9.3	22	450	42	3.2	65.6	5	69.8	5.3	100	4.4	11.0	4.0	
15	1.220	7.50	8.8	22.7								283				215
16	1.096															
17	0.990															
18	1.029	7.50	9.3	20.8	780							500				
19	0.979	7.60	9.0	21.1	610	21.2	2.6	57.2	7	44.1	5.4	25				
20	0.920	7.60	7.6	21.7	720	31.5	4.1	214.8	28	38.4	5	467				180
21	0.876	7.70	8.6	22.8	640	32.9	4.5	21.9	3	34.3	4.7		3.7	12.7	5.0	
22	0.855	7.70	8.6	23.6	830										4.45	
23	0.806		8.2	24.1												
24	1.898		7.9	23.7												
25	3.693		7.0	22.8												
26	2.249	7.20	7.3	24.1	560	58.1	3.1	356.4	19	63.8	3.4	525				
27	1.416	7.20	8.2	24.1	760	24.8	2.1	106.3	9	53.1	4.5	360				
28	1.247			24.1	680	30.2	2.9	31.2	3	15.6	1.5	190		10.3	3.1	
29	1.071	7.40			610											
30	0.961															330
31	0.891															
AVG.	1.771				724		3.5		9.2		4.2		AVG.			
MAX.	4.978	7.70				41.6		110.3		50.2			MAX.			
MIN.		7.10											MIN.			







THE CLASS

Cindy Garner ADEO NPDES ENFORCEMENT Water Division 5301 NORTHSHORE DRIVE NORTH Little Rock, AR. 72118-5317

RETURN RECEIPT REQUESTED