



ARKANSAS
Department of Environmental Quality

May 4, 2010

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

RE: Sanitary Sewer Overflow Inspection

AFIN: 18-00879

NPDES Permit No.: AR0022039

Dear Mr. Rimmer:

On February 4, 2010, I performed a Sanitary Sewer Overflow (SSO) inspection 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:

1. Mound City Station

- a. There was a large volume of what appeared to be petroleum oil in the wet well.**
- b. The electrical wiring and connections for the float switches were exposed.**
- c. The safety guards for the drive belts between the motors and pumps had been removed.**
- d. Only one of the two pumps was operational at the time of the inspection.**

2. Club Road Station

- a. There was a large volume of what appeared to be petroleum oil in the wet well.**
- b. There was exposed wiring and connections for the float switches on outside of the pump station.**
- c. There was evidence of an overflow from the adjacent manhole as indicated by the difference in the thickness, height and color of vegetation immediately around the manhole and along the drainage path leading from the manhole.**
- d. Only one of the two pumps was operational at the time of the inspection.**

3. Park Plaza Station

- a. There was an excessive accumulation of grease in the wet well.**
- b. The electrical control panel door was open and could not be closed due to exposed wiring and connections.**

- c. **The opening to the wet well on the inside of the station was open and thus presented a fall hazard to persons entering the station.**
- 4. Station #6**
 - a. **There was an excessive accumulation of grease in the wet well.**
 - b. **The lights in the lower level of the station were inoperative.**
 - c. **The hatch used for lifting equipment/pumps from the lower level was left open.**
 - d. **The exterior cover for the wet well was open.**
 - e. **The guards/covers had been removed from the drive shafts for the pumps.**
- 5. Station #9**
 - a. **There was an excessive accumulation of grease in the wet well.**
 - b. **One of the pumps was leaking heavily while running.**
 - c. **The only light for the lower level was hanging by its electrical wiring.**
 - d. **The grating covering the opening used for lifting equipment/pumps from the lower level was partially removed.**
- 6. Wyanoke Road Station**
 - a. **The roof was leaking at the time of inspection.**
- 7. Station #5**
 - a. **There was an excessive accumulation of grease in the wet well.**
 - b. **The safety guards for the drive belts between the motors and pumps had been removed.**
- 8. Station #4**
 - a. **Only two of the three pumps were operational.**
 - b. **The station is incapable of handling high flows and requires supplementing with a diesel powered auxiliary pump.**
 - c. **The exterior cover for the wet well was open.**
 - d. **There were exposed wiring and connections in the pump station.**
- 9. Shady Grove Station**
 - a. **There was an excessive accumulation of grease in the wet well.**
 - b. **Manhole cover was off the wet well and turned upside down in the leaves.**
 - c. **The manhole cover was partially off the adjacent manhole.**
 - d. **The pumps were short cycling at the time of the inspection due to a bad float and no replacement floats were available.**
- 10. Highway 77 Station**
 - a. **There was an excessive accumulation of grease in the wet well.**
 - b. **The manhole cover was off of the wet well.**
 - c. **The lights in the lower level of the station were inoperative.**
 - d. **The guards/covers had been partially removed from the drive shafts for the pumps.**

11. 7th Street Station

- a. **There was broken/missing conduit leading to the electric motors for the pumps.**
- b. **A portion of the roof flashing was torn loose.**
- c. **Only one of the two pumps was operational at the time of the inspection.**

12. Station #8

- a. **The grates covering the opening used for lifting equipment/pumps from the lower level were partially removed.**
- b. **There was a broken exterior window at the station.**
- c. **There were no operational lights in the lower level of the station.**

In addition to the above specific violations, the following annual totals of SSOs (Sanitary Sewer Overflows) were recorded in the facility's records:

- During the 2005 calendar year, there were 6 recorded SSOs.**
- During the 2006 calendar year, there were 4 recorded SSOs.**
- During the 2007 calendar year, there were 8 recorded SSOs.**
- During the 2008 calendar year, there were 11 recorded SSOs.**
- During the 2009 calendar year, there were 83 recorded SSOs.**
- As of the date of the inspection, there had been 11 recorded SSOs for 2010.**

There has been an extreme increase in the number of recorded overflows from the collection system. Regardless of the reason for this increase, (improved reporting methods, staff education, wet weather, mechanical problems, etc.) the sheer number of recent overflows as well as the extensive number of items noted at the individual pump stations during the course of the this inspection indicates a significant problem with the operation and maintenance of the collection system as well as its capacity for handling peak flows. It is therefore strongly suggested that you develop a comprehensive corrective action plan detailing the steps that will be taken to repair and maintain the collection system and to significantly reduce the number of sanitary sewer overflows. This plan should include a thorough evaluation of the collection system to identify all wastewater mains and pumping stations that cannot carry peak hydraulic loads.

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 **May 14, 2010.**

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

John Rimmer, City of West Memphis WWTP

May 4, 2010

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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



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

Form Approved
OMB No. 2040-0003

NPDES Compliance Inspection Report

Section A: National Data System Coding

Transaction Code	NPDES	Yr/Mo/Day	Inspec. Type	Inspector	Fac. Type	
1 <input type="text" value="N"/> 2 <input type="text" value="5"/> 3 <input type="text" value="A"/> <input type="text" value="R"/> <input type="text" value="0"/> <input type="text" value="0"/> <input type="text" value="2"/> <input type="text" value="2"/> <input type="text" value="0"/> <input type="text" value="3"/> <input type="text" value="9"/> 11 <input type="text" value="1"/> <input type="text" value="0"/> <input type="text" value="0"/> <input type="text" value="2"/> <input type="text" value="0"/> <input type="text" value="4"/> 17 18 <input type="text" value="V"/> 19 <input type="text" value="S"/> 20 <input type="text" value="1"/>	Remarks					
Inspection Work Days	Facility Evaluation Rating	BI	QA	-----Reserved-----		
67 <input type="text"/> <input type="text"/> <input type="text"/> 69	70 <input type="text" value="N"/>	71 <input type="text" value="N"/>	72 <input type="text" value="N"/>	73 <input type="text"/> <input type="text"/> <input type="text"/>	74 75 <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> 80	

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) City of West Memphis WWTP 502 Rushing Rd. West Memphis, AR Crittenden Co.	Entry Time/Date 0845 2/4/2010	Permit Effective Date 8/1/2008
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Denise Bosnick/Director of Environmental Quality/870-702-5141 Josh Grabowski/Water Superintendent/870-702-5102 Tommie Butler/Field Technician/870-702-5151 Marvin Jones/Lab Supervisor/870-702-5151	Exit Time/Date 1630 2/4/2010	Permit Expiration Date 7/31/2013
Name, Address of Responsible Official/Title/Phone and Fax Number John Rimmer/General Manager/870-735-3355 City of West Memphis WWTP P.O. Box 1868 West Memphis, AR 72303	Contacted Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Other Facility Data

Section C: Areas Evaluated During Inspection

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

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

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

Multiple violations were noted during the course of the inspection.

See the attached letter for details and additional information.

Name(s) and Signature(s) of Inspector(s) Brent L. Walker <i>Brent L. Walker</i>	Agency/Office/Telephone/Fax AR Dept. of Environmental Quality-Jonesboro (870) 935-7221 ext. 12/(870) 935-4715 (Fax)	Date April 22, 2010
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date

COLLECTION SYSTEM INSPECTION AND OVERALL RATING		<input type="checkbox"/> S <input type="checkbox"/> M <input checked="" type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
PROVIDE A BRIEF DESCRIPTION OF THE COLLECTION SYSTEM: Combination gravity and force main system		
POPULATION SERVED/NUMBER OF RESIDENTIAL AND COMMERCIAL CONNECTIONS: Pop.: ~28,000		
FEET OF SEWER SYSTEM: 166.5 miles		
AGE OF SYSTEM: Variable		
DOES THE SYSTEM EXPERIENCE PROBLEMS DURING DRY OR WET WEATHER (EXPLAIN): I&I problems in some locations	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE	
IS THERE A SYSTEM IN PLACE FOR REPORTING SSOS TO ADEQ (DESCRIBE): Director of Env. Quality receives reports from staff and reports to ADEQ	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE	
ARE ALL SSOs REPORTED REGARDLESS OF SIZE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE	
HAVE SSOs REACHED "WATERS OF THE STATE" (LIST DATE AND LOCATION OF EACH): All reported; see NPDES Enforcement Database	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE	
PUMP STATIONS		<input type="checkbox"/> S <input type="checkbox"/> M <input checked="" type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
NUMBER OF PUMP STATIONS IN SYSTEM: 37	NUMBER WITH BACKUP POWER: 0*	
HOW OFTEN ARE PUMP STATIONS INSPECTED/MONITORED: Main stations 6/wk; all at least 2/wk		
ARE MAINTENANCE RECORDS AND/OR OPERATOR LOGS KEPT: Yes		
ADEQUATE INVENTORY OF SPARE PARTS: No – no spare floats at time of inspection		
TYPE OF REMOTE ELECTRONIC MONITORING USED (I.E. SCADA OR AUTO DIALERS): SCADA and/or Phone		
BRIEF SUMMARY OF EMERGENCY PROCEDURES: *large stations have auxiliary pump connections – small stations require manual installation of an emergency pump		
NUMBER OF PUMP STATIONS VISITED DURING INSPECTION (SEE ATTACHED CHECKLISTS FOR EACH): 12**		
**NOTE: Due to the number of stations visited, a separate checklist was not completed for each station. See attached letter and photos for details.		
SATELLITE SYSTEMS		<input type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
DOES THE COLLECTION SYSTEM RECEIVE FLOW FROM SATELLITE SYSTEMS: No		
TYPE(S) OF WASTE WATER RECEIVED: <input type="checkbox"/> RESIDENTIAL <input type="checkbox"/> COMMERCIAL <input type="checkbox"/> INDUSTRIAL <input type="checkbox"/> OTHER:		
BRIEFLY DESCRIBE THE SATELLITE SYSTEM:		
ANY KNOWN PROBLEMS WITH SATELLITE SYSTEM:		
NAME, ADDRESS AND PHONE NUMBER OF PERSON RESPONSIBLE FOR SATELLITE SYSTEM:		

Water Division NPDES Photographic Evidence Sheet

Location: City of West Memphis – Mound City Station

Photographer: Brent Walker **Witness:** None

Photo # 1 **Of** 34 **Date:** 2/4/2010 **Time:** 1128

Description: Petroleum oil visible in wet well.



Photographer: Brent Walker **Witness:** None

Photo # 2 **Of** 34 **Date:** 2/4/2010 **Time:** 1133

Description: Sample of material from wet well.



Water Division NPDES Photographic Evidence Sheet

Location:	City of West Memphis – Mound City Station						
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Photographer:	Brent Walker	Witness:	None		
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Photo #	3	Of	34	Date:	2/4/2010	Time:	1139
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Description:	Exposed wiring for floats.						
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Photographer:	Brent Walker	Witness:	None		
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Photo #	4	Of	34	Date:	2/4/2010	Time:	1130
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Description:	Guard removed from belts.						
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Water Division NPDES Photographic Evidence Sheet

Location: City of West Memphis – Club Rd. Station

Photographer: Brent Walker **Witness:** None

Photo # 5 **Of** 34 **Date:** 2/4/2010 **Time:** 1156

Description: Exposed wiring on outside of station.



Photographer: Brent Walker **Witness:** None

Photo # 6 **Of** 34 **Date:** 2/4/2010 **Time:** 1157

Description: Petroleum oil contamination in wet well.



Water Division NPDES Photographic Evidence Sheet

Location: City of West Memphis – Club Rd. Station

Photographer: Brent Walker **Witness:** None

Photo # 7 **Of** 34 **Date:** 2/4/2010 **Time:** 1157

Description: Petroleum oil in wet well.



Photographer: Brent Walker **Witness:** None

Photo # 8 **Of** 34 **Date:** 2/4/2010 **Time:** 1158

Description: Evidence of recent overflow from adjacent manhole indicated by the difference in the thickness, height and color of vegetation.



Water Division NPDES Photographic Evidence Sheet

Location:	City of West Memphis – Park Plaza Station						
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Photographer:	Brent Walker	Witness:	None		
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Photo #	9	Of	34	Date:	2/4/2010	Time:	1207
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Description:	Excessive grease in wet well.						
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Photographer:	Brent Walker	Witness:	None		
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Photo #	10	Of	34	Date:	2/4/2010	Time:	1207
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Description:	Exposed wiring; control panel door can not be closed due to improper routing of wires.						
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Water Division NPDES Photographic Evidence Sheet

Location:	City of West Memphis – Station #6						
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Photographer:	Brent Walker	Witness:	None		
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Photo #	11	Of	34	Date:	2/4/2010	Time:	1411
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Description:	Excessive grease in wet well.						
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Photographer:	Brent Walker	Witness:	None		
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Photo #	12	Of	34	Date:	2/4/2010	Time:	1411
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Description:	Wet well cover left open.						
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Water Division NPDES Photographic Evidence Sheet

Location:	City of West Memphis – Station #6						
Photographer:	Brent Walker			Witness:	None		
Photo #	13	Of	34	Date:	2/4/2010	Time:	1413
Description:	Hatch left open.						



Photographer:	Brent Walker			Witness:	None		
Photo #	14	Of	34	Date:	2/4/2010	Time:	1414
Description:	Pump shafts with guards removed.						



Water Division NPDES Photographic Evidence Sheet

Location: City of West Memphis – Station #6

Photographer: Brent Walker **Witness:** None

Photo # 15 **Of** 34 **Date:** 2/4/2010 **Time:** 1415

Description: Pump shafts with guards removed.



Photographer: Brent Walker **Witness:** None

Photo # 16 **Of** 34 **Date:** 2/4/2010 **Time:** 1415

Description: Guards from pump shaft leaning against wall behind stairs.



Water Division NPDES Photographic Evidence Sheet

Location: City of West Memphis – Station #9

Photographer: Brent Walker **Witness:** None

Photo # 17 **Of** 34 **Date:** 2/4/2010 **Time:** 1425

Description: Open grating.



2/4/2010 / 14:25:42

Photographer: Brent Walker **Witness:** None

Photo # 18 **Of** 34 **Date:** 2/4/2010 **Time:** 1426

Description: Light hanging from wire.



2/4/2010 / 14:26:26

Water Division NPDES Photographic Evidence Sheet

Location:	City of West Memphis – Station #9						
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Photographer:	Brent Walker	Witness:	None		
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Photo #	19	Of	34	Date:	2/4/2010	Time:	1426
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Description:	Pump shaft with guards removed.						
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Photographer:	Brent Walker	Witness:	None		
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Photo #	20	Of	34	Date:	2/4/2010	Time:	1426
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Description:	Pump shaft with guard removed; leaking pump.						
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Water Division NPDES Photographic Evidence Sheet

Location:	City of West Memphis – Station #5						
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Photographer:	Brent Walker	Witness:	None		
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Photo #	21	Of	34	Date:	2/4/2010	Time:	1448
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Description:	Excessive grease in wet well.						
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Photographer:	Brent Walker	Witness:	None		
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Photo #	22	Of	34	Date:	2/4/2010	Time:	1448
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Description:	Belts with guard removed.						
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Water Division NPDES Photographic Evidence Sheet

Location: City of West Memphis – Station #4

Photographer: Brent Walker **Witness:** None

Photo # 23 **Of** 34 **Date:** 2/4/2010 **Time:** 1456

Description: Wet well cover open.



Photographer: Brent Walker **Witness:** None

Photo # 24 **Of** 34 **Date:** 2/4/2010 **Time:** 1459

Description: Exposed wiring.



Water Division NPDES Photographic Evidence Sheet

Location:	City of West Memphis – Station #4						
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Photographer:	Brent Walker	Witness:	None		
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Photo #	25	Of	34	Date:	2/4/2010	Time:	1458
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Description:	Pump shaft with guard removed.						
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Photographer:	Brent Walker	Witness:	None		
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Photo #	26	Of	34	Date:	2/4/2010	Time:	1500
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Description:	Auxiliary pump used for high flows.						
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Water Division NPDES Photographic Evidence Sheet

Location: City of West Memphis – Shady Grove Station

Photographer: Brent Walker **Witness:** None

Photo # 27 **Of** 34 **Date:** 2/4/2010 **Time:** 1509

Description: Manhole cover off wet well and upside down in leaves.



Photographer: Brent Walker **Witness:** None

Photo # 28 **Of** 34 **Date:** 2/4/2010 **Time:** 1509

Description: Excessive grease in wet well.



Water Division NPDES Photographic Evidence Sheet

Location: City of West Memphis – Hwy. 77 Station

Photographer: Brent Walker **Witness:** None

Photo # 29 **Of** 34 **Date:** 2/4/2010 **Time:** 1531

Description: Manhole cover off wet well.



Photographer: Brent Walker **Witness:** None

Photo # 30 **Of** 34 **Date:** 2/4/2010 **Time:** 1531

Description: Excessive grease in wet well.



Water Division NPDES Photographic Evidence Sheet

Location:	City of West Memphis – 7 th St. Station						
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Photographer:	Brent Walker	Witness:	None		
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Photo #	31	Of	34	Date:	2/4/2010	Time:	1544
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Description:	Exposed wiring.						
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2/4/2010 / 15:44:30

Photographer:	Brent Walker	Witness:	None		
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Photo #	32	Of	34	Date:	2/4/2010	Time:	1545
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Description:	Broken conduit/exposed wiring.						
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2/4/2010 / 15:45:42

Water Division NPDES Photographic Evidence Sheet

Location:	City of West Memphis – Station #8						
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Photographer:	Brent Walker	Witness:	None		
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Photo #	33	Of	34	Date:	2/4/2010	Time:	1555
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Description:	Open grate with drop light.						
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Photographer:	Brent Walker	Witness:	None		
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Photo #	34	Of	34	Date:	2/4/2010	Time:	1554
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Description:	Lights inoperative in lower level.						
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WEST MEMPHIS UTILITY COMMISSION

604 East Cooper P O Box 1868

West Memphis, AR 72301

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

May 21, 2010

Cindy Garner
Enforcement Branch Manager
Water Division
Arkansas Dept of Environmental Quality
5301 Northshore Drive
North Little Rock, Ar 72118-5317

Re: Sanitary Sewer Overflow Inspection

AFIN: 18-00879

NPDES Permit No: AR0022039

Ms. Garner,

This letter is in response to the finding of an inspection performed by Brent Walker on February 4, 2010.

1. Pump Station-25 (Mound City Road)
 - a. The wet well was cleaned on April 26, 2010 by Jim's Tank Service. As of this date there is no sign of petroleum oil in the wet well. The cause was found to be a business located close to the pump station.
 - b. The electrical wiring and connections for the float switches has been covered up.
 - c. The safety guards for the drive belts between the motors and pumps have been put in place.
 - d. The suction line on one of the pumps was bad and it was replaced. Both pumps are operational at this time.

2. Pump Station-13 (Club Road)
 - a. The wet well was cleaned on April 27, 2010 by Jim's Tank Service. As of this date there is no sign of petroleum oil in the wet well.
 - b. The exposed wiring and connections for the float switches on the outside of the pump stations have been covered up and locked.
 - c. At the time of the inspection there was evidence of an overflow from an adjacent manhole. There was a problem with this manhole and it has been repaired.
 - d. Both pumps are operational at this time.

3. Pump Station-13A (Park Plaza)

- a. This station will be put on a routine schedule to be cleaned. The only thing going to this station is a residential apartment complex. There are 208 apartments in this complex.
- b. The electrical wiring and connections were put back into the panel and the door is now closed.
- c. The opening to the wet well inside the station is now closed.

4. Pump Station-6 (401 South Avalon)

- a. This station will be put on a routine schedule to be cleaned
- b. New lights were installed and are operational in the lower level of the station.
- c. The hatch used for lifting equipment in the station is now closed.
- d. The exterior cover for the wet well is closed and locked.
- e. The guards/covers for the drive shafts for the pumps are in place.

5. Pump Station-9 (1620 South Avalon)

This station is scheduled to be rehabbed in 2010. The bids were approved by the West Memphis Utility Commission in May. Rehab will consist of replacing the pumps, motors, control panel and the SCADA system.

6. Pump Station-31 (Wyanoke Road)

- a. The roof has been repaired and the lights are operational.

7. Pump Station-5 (334 West Oliver)

This station was rehabbed in March of this year. Pumps, motors and the control panel were replaced. This station will be put on a routine schedule to be cleaned.

8. Pump Station-4 (900 Lehr)

- a. There are only two operational pumps for this station. When the station was last rehabbed the other pump was not pulled.
- b. The diesel auxiliary pump is stored there.
- c. The exterior cover to the wet well is now closed
- d. The exposed wiring and connections are now covered up.

9. Pump Station-26A (Shady Grove)

- a. This station will be put on a routine schedule to be cleaned.
- b. The cover to the wet well is now in place,

- c. The cover to the adjacent manhole is in place.
 - d. The pumps were short cycling at the time of the inspection due to a bad float. The float has been replaced. We do have replacements floats.
10. Pump Station-34 (Highway 77)
- a. This station will be put on a routine schedule to be cleaned.
 - b. The cover to the wet well is now in place.
 - c. The lights in the lower level of the station have been repaired and are operational.
 - d. The guards/covers for the drive shaft for the pumps are in place.
11. Pump Station-20 (603 North 7th)
- a. The conduit leading to the electric motors for the pumps has been replaced.
 - b. The roof flashing has been repaired.
 - c. Both pumps are operational at this time.
12. Pump Station-8 (610 East Jefferson)
- a. The grates covering the opening used for lifting equipment is now in place.
 - b. Windows are repaired
 - c. Lights in the lower level are now installed and operational.

We have done a self evaluation on all forty-two (42) of our pump stations and are working on correcting the deficiencies at this time. This should be completed by the end of May.

We propose a five year Corrective Action Plan to address the problems associated with excessive I/I onto the sanitary sewer system. That plan is included with this letter.

Please find attached photos of the repairs noted at each station.

If you have any questions, please contact me at (870) 702-5103.

Sincerely,



John Rimmer
General Manager

Corrective Action Plan

The City of West Memphis Utility Commission proposes to enact a 5 year Corrective Action Plan to address the problems associated with excessive I/I onto the sanitary sewer system. This plan will address current problems and develop a program to abate future problems through an improved maintenance program. The following is a 4-step plan and the associated timeline.

1. Begin immediately a Phase I rehabilitation program to correct Priority 1 and 2 defects located during the SSES. All of the Priority defects and most of the Priority 2 defects will be rehabilitated in 2011. This will consist of various methods of rehab including but not limited to:
 - A. Mainline point repairs
 - B. Relining or replacement of mainlines
 - C. Repair or replacement of manholes
 - D. Installation of rain caps for manholes
 - E. Root removal and mainline cleaning
 - F. Rehab of deficient pump stations

Appendix A and B provides a complete listing and precise location of all priority 1 and 2 defects recommended for rehabilitation.

2. Upon completion of Phase I rehabilitation program, the SSES will be resumed in the areas that were not investigated during the initial SSES. The initial SSES included mapping, database development, pump station analysis and hydraulic assessment for the entire system. There fore, the second phase SSES will consist primarily of field tasks to locate defects and prepare rehab recommendations within the area of the collection system that were not investigated in Phase I.

Another aspect to be undertaken in the Phase II SSES will be monitoring the results of the Phase I rehabilitation program and the effects on I/I reduction. These results will be used for future rehab programs to determine the most effective methods for achieving I/I reduction.

3. Based upon the results of the Phase II SSES, the Phase II rehabilitation program will be developed. All priority 1 defects found will be correct and based upon the effectiveness of priority 2 rehab in Phase I, a determination made Priority 2 repairs. Phase II rehab will be spread over a 2 year period as the area covered in the study is twice the size of the initial program.
4. The final step in the Corrective Action Plan is the development and implementation of a Comprehensive Maintenance Management Program (CMMP). The CMMP will be designed as a program to manage the maintenance and capital improvements of the system for the purpose of the efficient overall operation of the system to maintain regulatory compliance and eliminate customer service problems. The basis of the program is to provide a well organized approach in a proactive manner in

identifying and correcting maintenance problems before they become customer service complaints or regulatory violations.

Specific aspects to be addressed in the development of a CMMP are as follows:

- A. Identify specific goals and objective of CMMP
- B. System and software to manage program
 - i. GIS Software
 - ii. Database development
- C. Evaluation of Equipment Needs for Operation of Program
 - i. Cleaning and Inspection of Equipment
 - ii. Investigate tools (smoke test)

The development of the CMMP will begin immediately with the program being implemented completely within 5 years.

Conclusion

The City of West Memphis Utility Commission agrees to adopt this 5-year plan to achieve not only regulatory compliance, but also the efficient and cost effective collection and treatment of wastewater for its customers in West Memphis. This commitment is evident through the development of this Plan and the SSES. Further evidence of this commitment can be found in the following examples:

- I. Rehabbed 5 pump stations in the last 3 years and currently have ordered material for a future rehab.
- II. Replaced 50' of 24" pipe that was having major I/I problems.
- III. Acquiring budgetary numbers to install SCADA in all pumping stations.
- IV. Hiring an outside specialist to inspect pumps to see if they are pumping to capacity.
- V. Creating specifications for new installations to prevent future I/I problems
- VI. Self inspection of all 42 stations, repairs will be completed by the end May

These projects and this Plan are strong evidence of the commitment by the City of West Memphis to address the sewer infrastructure in an aggressive and proactive manner. The elements of this plan will allow the City to achieve the stated goals and objectives of regulatory compliance and I/I reduction.

West Memphis Utility

Location: Pump Station-25 (Mound City Road)

Photographer: Denise Bosnick

Witness: Marvin Jones

Photo #: Of

Date: 5/17/2010

Description: Wet Well



West Memphis Utility

Location: Pump Station-25 (mound City Road)

Photographer: Denise Bosnick

Witness: Marvin Jones

Photo #: Of

Date: 5/17/2010

Description: Sample of contents of wet well



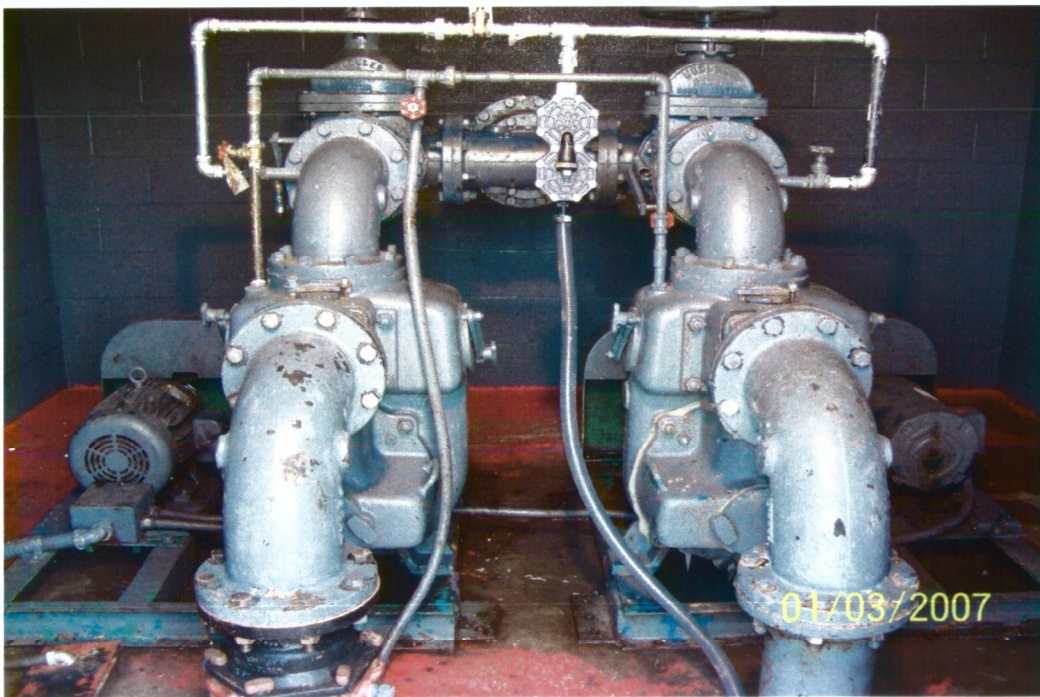
West Memphis Utility

Location:	Pump Station-25 (Mound City Road)		
Photographer:	Denise Bosnick	Witness:	Marvin Jones
Photo #:	Of	Date:	5/17/2010
Description:	Exposed wiring (Covered)		



West Memphis Utility

Location:	Pump Station-25 (Mound City Road)		
Photographer:	Denise Bosnick	Witness:	Marvin Jones
Photo #:	Of	Date:	5/17/2010
Description:	Guards replaced on belts.		



BATTERY was removed. DATE went back to default.

West Memphis Utility

Location: Pump Station-13 (Club Road)

Photographer: Denise Bosnick

Witness: Marvin Jones

Photo #: Of

Date: 5/17/2010

Description: Exposed wiring on outside of station. (Covered and locked)



West Memphis Utility

Location: Pump Station-13 (Club Road)

Photographer: Denise Bosnick

Witness: Marvin Jones

Photo #: Of

Date: 5/17/2010

Description: Wet Well



West Memphis Utility

Location:	Pump Station-13 (Club Road)		
Photographer:	Denise Bosnick	Witness:	Marvin Jones
Photo #:	Of	Date:	5/17/2010
Description:	Sample from the wet well (Not Petroleum oil)		



West Memphis Utility

Location:	Pump Station-13 (Club Road)		
Photographer:	Denise Bosnick	Witness:	Marvin Jones
Photo #:	Of	Date:	5/17/2010
Description:	Sample from the wet well (Not Petroleum oil)		



West Memphis Utility

Location:	Pump Station-13 (Club Road)		
Photographer:	Denise Bosnick	Witness:	Marvin Jones
Photo #:	Of	Date:	5/17/2010
Description:	Adjacent manhole was repaired		



West Memphis Utility

Location:	Pump Station-13A (Park Plaza)		
Photographer:	Denise Bosnick	Witness:	Marvin Jones
Photo #:	Of	Date:	5/17/2010
Description:	Wet Well		



West Memphis Utility

Location: Pump Station-13A (Park Plaza)

Photographer: Denise Bosnick

Witness: Marvin Jones

Photo #: Of

Date: 5/17/2010

Description: Wet Well Covered



West Memphis Utility

Location: Pump Station-13A (Park Plaza)

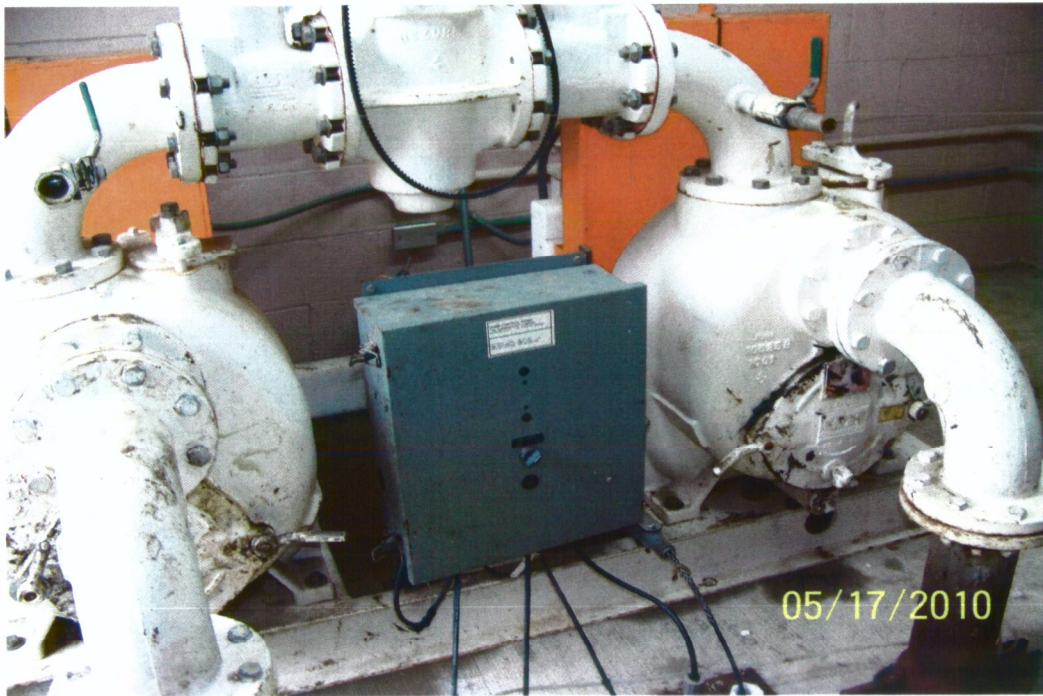
Photographer: Denise Bosnick

Witness: Marvin Jones

Photo #: Of

Date: 5/17/2010

Description: Exposed wiring; control panel (Closed)



West Memphis Utility

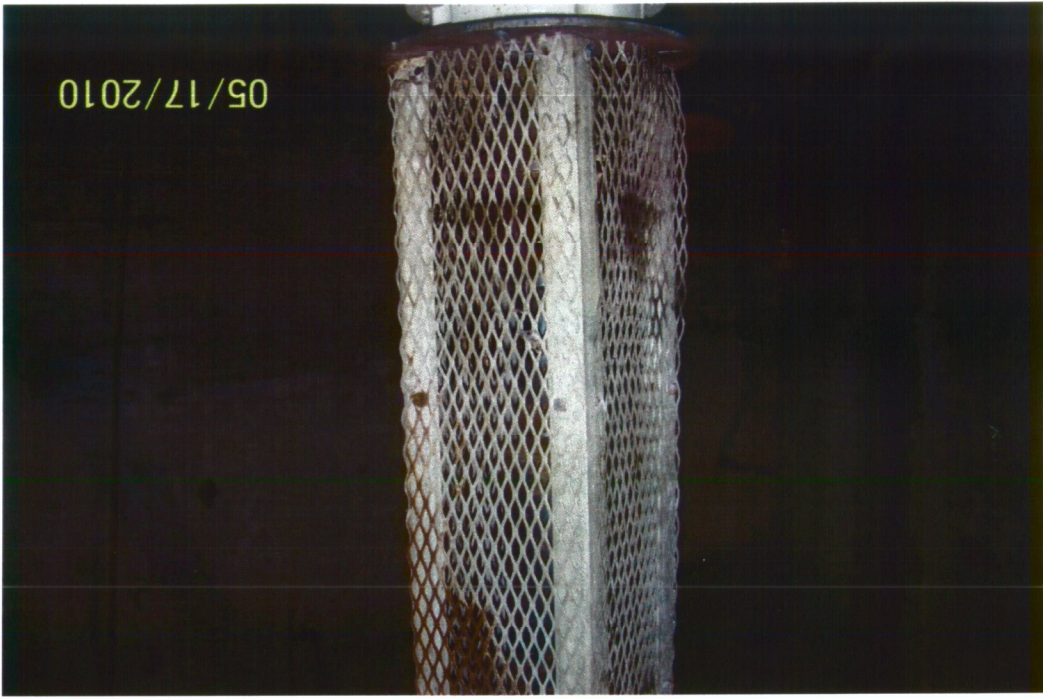
Location:	Pump Station-6 (401 South Avalon)		
Photographer:	Denise Bosnick	Witness:	Marvin Jones
Photo #:	Of	Date:	5/17/2010
Description:	Wet Well		



West Memphis Utility

Location:	Pump Station-6 (401 South Avalon)		
Photographer:	Denise Bosnick	Witness:	Marvin Jones
Photo #:	Of	Date:	5/17/2010
Description:	Wet Well (Covered)		





05/17/2010

West Memphis Utility		Location: Pump Station-6 (401 South Avalon)	
Photographer: Denise Bosnick		Witness: Marvin Jones	
Photo #: Of		Date: 5/17/2010	
Description: Pump Shaft with Guards			



05/17/2010

West Memphis Utility		Location: Pump Station-6 (401 South Avalon)	
Photographer: Denise Bosnick		Witness: Marvin Jones	
Photo #: Of		Date: 5/17/2010	
Description: Hatch closed			

West Memphis Utility

Location: Pump Station-5 (334 West Oliver)

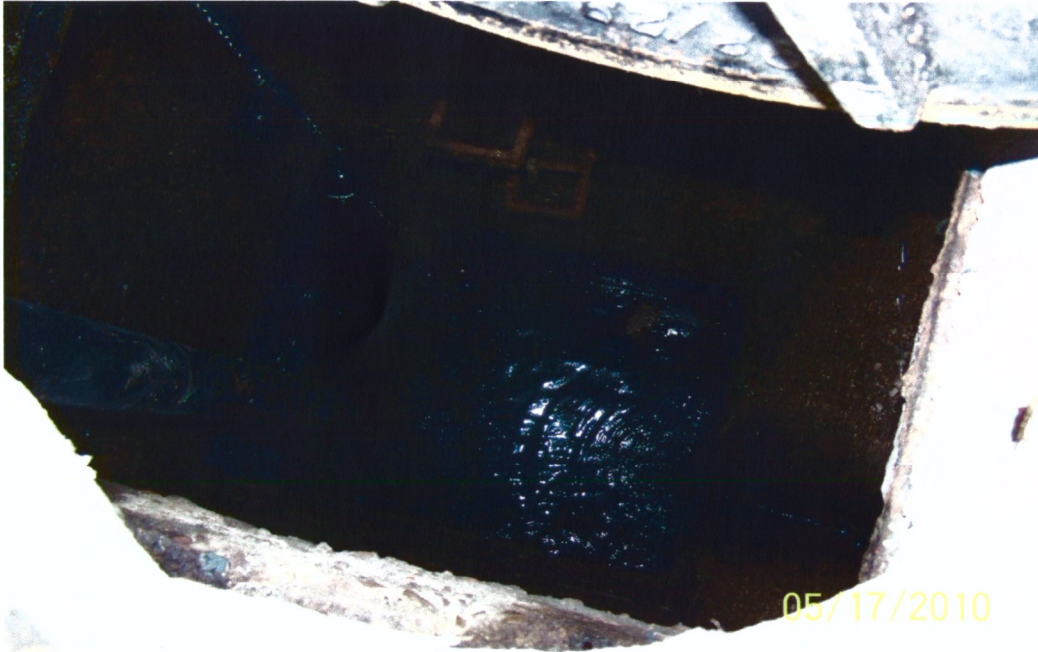
Photographer: Denise Bosnick

Witness: Marvin Jones

Photo #: Of

Date: 5/17/2010

Description: Wet Well



West Memphis Utility

Location: Pump Station-5 (334 West Oliver)

Photographer: Denise Bosnick

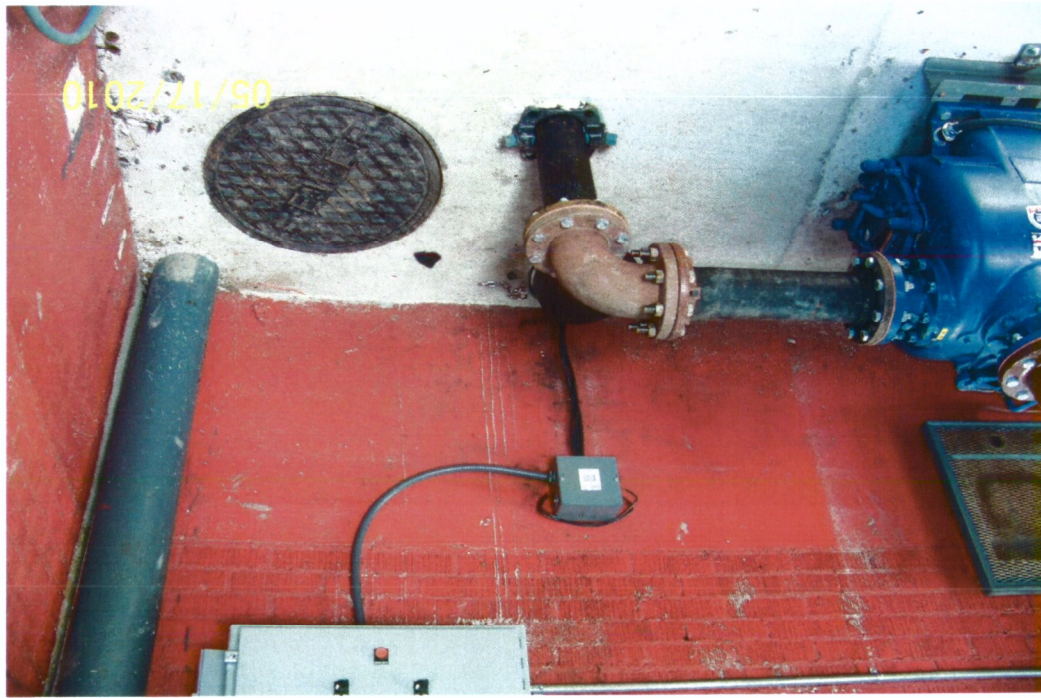
Witness: Marvin Jones

Photo #: Of

Date: 5/17/2010

Description: Inside station





West Memphis Utility		Location: Pump Station-5 (334 West Oliver)	
Photographer: Denise Bosnick		Witness: Marvin Jones	
Photo #:	Of	Date:	5/17/2010
Description: Inside station			



West Memphis Utility		Location: Pump Station-5 (334 West Oliver)	
Photographer: Denise Bosnick		Witness: Marvin Jones	
Photo #:	Of	Date:	5/17/2010
Description: Inside station			

West Memphis Utility

Location: Pump Station-4 (900 Lehr)

Photographer: Denise Bosnick

Witness: Marvin Jones

Photo #: Of

Date: 5/17/2010

Description: Wet well (Covered)



West Memphis Utility

Location: Pump Station-4 (900 Lehr)

Photographer: Denise Bosnick

Witness: Marvin Jones

Photo #: Of

Date: 5/17/2010

Description: Exposed Wiring (covered)

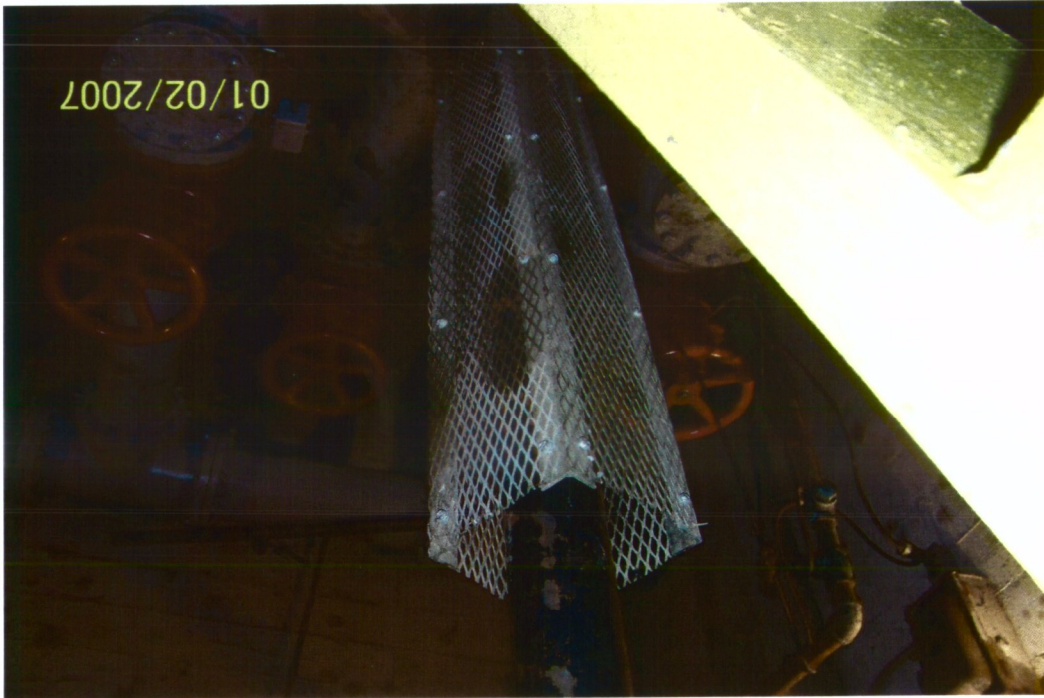


BATTERY was removed. DATE WENT back TO default.

Battery was removed. Gate went back to default.



West Memphis Utility		Location: Pump Station-4 (900 Lehr)	
Photographer: Denise Bosnick		Witness: Marvin Jones	
Photo #:	Of	Date: 5/17/2010	
Description: Pump Shaft with guard in place			



West Memphis Utility		Location: Pump Station-4 (900 Lehr)	
Photographer: Denise Bosnick		Witness: Marvin Jones	
Photo #:	Of	Date: 5/17/2010	
Description: Pump Shaft with guard in place			

West Memphis Utility

Location: Pump Station-26A (Shady Grove)

Photographer: Denise Bosnick

Witness: Marvin Jones

Photo #: Of

Date: 5/17/2010

Description: Wet Well



West Memphis Utility

Location: Pump Station-26A (Shady Grove)

Photographer: Denise Bosnick

Witness: Marvin Jones

Photo #: Of

Date: 5/17/2010

Description: Wet Well (Covered)



West Memphis Utility

Location: Pump Station-34 (Highway 77)

Photographer: Denise Bosnick

Witness: Marvin Jones

Photo #: Of

Date: 5/17/2010

Description: Wet Well (Covered)



West Memphis Utility

Location: Pump Station-34 (Highway 77)

Photographer: Denise Bosnick

Witness: Marvin Jones

Photo #: Of

Date: 5/17/2010

Description: Wet Well (Covered)



West Memphis Utility

Location: Pump Station-20 (603 North 7th)

Photographer: Denise Bosnick

Witness: Marvin Jones

Photo #: Of

Date: 5/17/2010

Description: Exposed wiring (Covered)



West Memphis Utility

Location: Pump Station-20 (603 North 7th)

Photographer: Denise Bosnick

Witness: Marvin Jones

Photo #: Of

Date: 5/17/2010

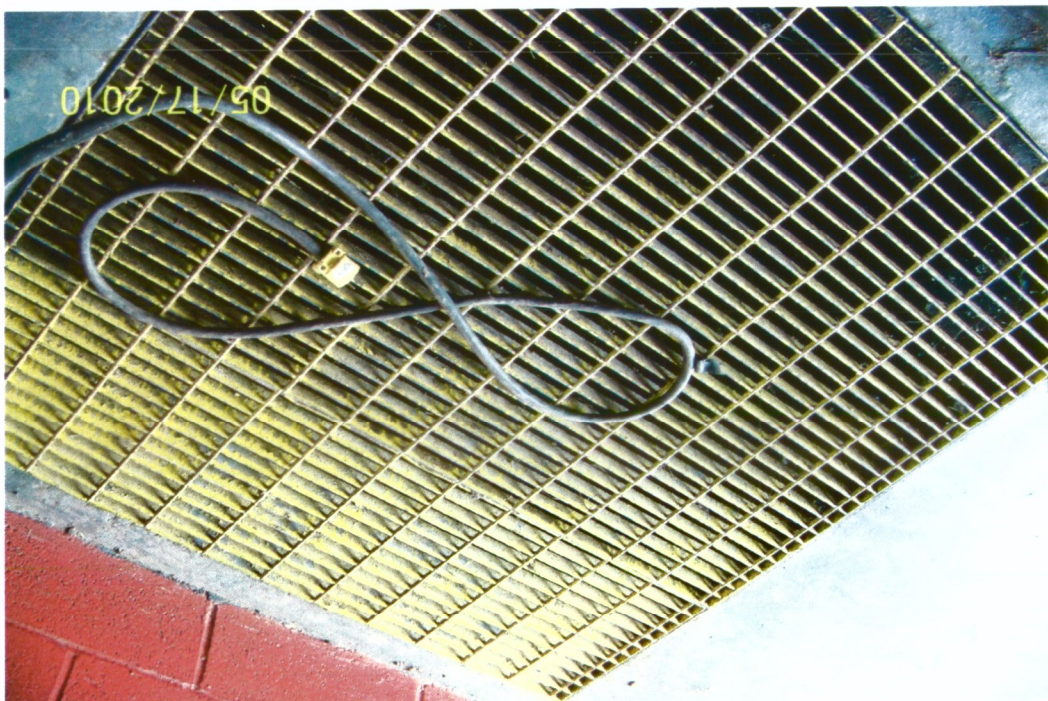
Description: Exposed wiring (Covered)



Battery was removed. Date went back to default.



West Memphis Utility		Location: Pump Station-8 (610 East Jefferson)	
Photographer: Denise Bosnick		Witness: Marvin Jones	
Photo #:	Of	Date: 5/17/2010	
Description: Lights in lower level			



West Memphis Utility		Location: Pump Station-8 (610 East Jefferson)	
Photographer: Denise Bosnick		Witness: Marvin Jones	
Photo #:	Of	Date: 5/17/2010	
Description: Grate (Closed)			

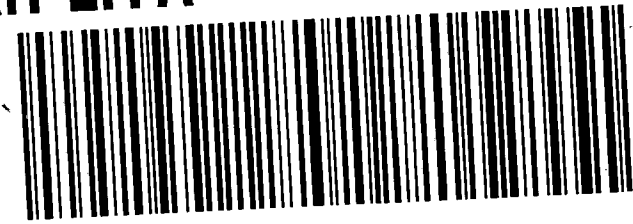
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City WEST MEMPHIS State AR ZIP 72301-3249

2 Your Internal Billing Reference

3 To Recipient's Name Cindy Garner Phone

Company Arkansas Dept. of Environmental Quality Enforcement Branch Manager, Water Division

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 Cargo Aircraft Only

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ADEQ

ARKANSAS
Department of Environmental Quality

June 15, 2010

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

RE: NPDES Permit No.: AR0022039, AFIN: 18-00879
Response to Inspection

Dear Mr. Rimmer:

The Department has received your response to the February 4, 2010 inspection of the above referenced facility by our District Field Inspector, Brent Walker. Your letter appears to adequately address the discrepancies identified during the visit. The Department assumes the corrective actions taken will be maintained to ensure consistent compliance with the requirements of the permit. Acceptance of this response by the Department does not preclude any future enforcement action deemed necessary at this site or any other site.

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

If we need further information concerning this matter, we will contact you. Thank you for your attention to this matter. Should you have any questions, feel free to contact me at 501-682-0823 or you may e-mail me at woodbury@adeq.state.ar.us.

Sincerely,



Anne Woodbury
Enforcement Analyst
Water Division Enforcement Branch