



ARKANSAS  
Department of Environmental Quality

May 4, 2010

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

RE: City of West Memphis WWTP

AFIN: 18-00879

NPDES Permit No.: AR0022039

Dear Mr. Rimmer:

On February 2, 3, & 4, 2010, I performed a Pretreatment Compliance Inspection (PCI) of the above referenced 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. During the industrial user visit at PSC Container Services, the following items were noted:**
  - a. A BMR (Baseline Monitoring Report) has not been received from this facility.**
  - b. The sampling location for the collection of samples by city personnel did not appear adequate for representative and tamper resistant sampling.**
  - c. PSC Container Services personnel were not familiar with the pretreatment requirements.**
  - d. PSC Container Services personnel were not familiar with operation of the pretreatment equipment they were responsible for operating.**
  - e. There had been a recent discharge from an exterior holding/mixing tank into its surrounding secondary containment structure which had a leaking drain valve and was discharging to the surface of the ground.**
- 2. Warren Unilube had discharged an unknown volume of petroleum oil to the collection system and thence to the treatment plant approximately four days prior to this PCI. Warren Unilube has a history of illicit discharges and should be fully evaluated and permitted with requirements implemented to protect the collection system and waste water treatment plant.**
- 3. Awesome Products has consumed in excess of one million gallons for two months, but has not been evaluated or permitted as a Significant Industrial User.**

4. **Both the Mound City and Club Road pump stations, which serve multiple truck stops, truck washes and truck service facilities, appeared to contain large amounts of petroleum oil. It appears that additional practices should be implemented to protect the collection system and thus waste water treatment plant from illicit discharges from these types of facilities.**
5. **The permit for Stateside Steel expired November 30, 2009 and has not yet been renewed.**
6. **The quarterly sampling for metals was not completed for all required metals all four times.**

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.

If I can be of any assistance, please contact me at [walker@adeq.state.ar.us](mailto: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

# NPDES Compliance Inspection Report

Form Approved  
OMB No. 2040-0003

## Section A: National Data System Coding

Transaction Code	NPDES	Yr/Mo/Day	Inspec. Type	Inspector	Fac. Type
1 N 2 5 3 A R 0 0 2 2 0 3 9 11 12 1 0 0 2 0 2 17 18 P 19 S 20 1					
Remarks					
Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
67	70 N	71 N	72 N	73	74 75

## Section B: Facility Data

Name and Location of Facility Inspected ( <i>For industrial users discharging to POTW, also include POTW name and NPDES permit number</i> ) <b>City of West Memphis WWTP</b> <b>502 Rushing Rd.</b> <b>West Memphis, AR</b> <b>Crittenden Co.</b>	Entry Time/Date <b>1345 2/2/2010 0845 2/3/2010</b> <b>0845 2/4/2010</b>	Permit Effective Date <b>8/1/2008</b>
	Exit Time/Date <b>1615 2/2/2010 1605 2/3/2010</b> <b>1630 2/4/2010</b>	Permit Expiration Date <b>7/31/2013</b>
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) <b>Denise Bosnick/Director of Environmental Quality/870-702-5141</b> <b>Tommie Butler/Field Technician/870-702-5151 Marvin Jones/Lab Supervisor/870-702-5151</b>	Other Facility Data	
Name, Address of Responsible Official/Title/Phone and Fax Number <b>John Rimmer/General Manager/870-735-3355</b> <b>City of West Memphis Utilities</b> <b>P.O. Box 1868</b> <b>West Memphis, AR 72303</b>	Contacted Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	

## Section C: Areas Evaluated During Inspection

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

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

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

See the attached letter and PCI report for details.

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



A. INDUSTRIAL USER SURVEY

1. List any Significant Industrial Users (SIUs) which have been added or deleted from the program since the last audit or inspection. Added PSC Container Services, LLC  
Removed DIAZ Intermediates
2. Has ADEQ or EPA been notified of these changes? Yes
3. **HAS THE INDUSTRIAL USER SURVEY BEEN KEPT UPDATED?** No  
Awesome Products has exceeded one million gallons water use but has not been added as an SIU
4. What procedures are being used to update the IU Survey?  
Review of new city permits.  
Review of new accounts.  
Code enforcement
5. Total number of Significant Industrial Users, according to the definition used by the POTW. (This number must be greater than or equal to the answer to question 6) 4
6. Number of Categorical Industrial Users: 4
7. How does the POTW determine the appropriate categorical standards to apply to an IU? NAICS & 40 CFR
8. List all categorical IUs discharging under the approved (such program. Include the name of the IU, the regulatory category as Metal Finishing), and the regulated process (phosphating, zinc plating, etc.) Additional listings can be made in the comments section if necessary.

Name of IU:	Category:	Regulated Process:
<b>PSC Container</b>	<b>Truck wash</b>	<b>Int./Ext. Truck Wash</b>
<b>Grace Trailer</b>	<b>Truck wash</b>	<b>Int./Ext. Truck Wash</b>
<b>Automated Conveyors</b>	<b>Metal Finishing</b>	<b>Metal Plating</b>
<b>Stateside Steel &amp; Wire</b>	<b>Metal Finishing</b>	<b>Metal Plating</b>

B. LOCAL LIMITS

1. IS THE POTW APPLYING LOCAL LIMITS WHICH HAVE BEEN APPROVED BY ADEQ OR EPA? Yes - for electroplaters

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2. Describe any apparent problems with the local limits.  
None

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3. How often are pollutant scans of POTW influent, effluent, and sludge performed by the POTW? Does this fulfill the requirements of the approved program (as described in the fact sheet) and part III of the NPDES permit?

Pollutant:	Frequency:	Requirement in Permit:	Requirement in Program:	Comments:
Metals:				
Influent:	<u>4/yr</u>	<u>4/yr</u>	<u>None</u>	<u>Missed some parameters</u>
Effluent:	<u>4/yr</u>	<u>4/yr</u>	<u>None</u>	<u>Missed some parameters</u>
Sludge:	<u>1/yr</u>	<u>N/A</u>	<u>None</u>	<u>None</u>
Organics:				
Influent:	<u>1/yr</u>	<u>1/yr</u>	<u>None</u>	<u>None</u>
Effluent:	<u>1/yr</u>	<u>1/yr</u>	<u>None</u>	<u>None</u>
Sludge:	<u>1/yr</u>	<u>N/A</u>	<u>None</u>	<u>None</u>

4. Have there been any inhibitions or upsets at the POTW (since the last PCI of Audit) which were believed to be caused by industrial discharges? If so, describe the action taken by the City to ensure that the incident would not recur. Were these actions effective?  
Warren Unilube discharged pink oil (transmission fluid?) to collection system on January 29, 2010. POTW will require Warren Unilube to be permitted through the pretreatment program as this is a repeat incident.

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C. INDUSTRIAL USER CONTROL MECHANISM

1. Is the POTW using the type of control mechanism (permit, agreement, etc.) required by the approved program? Yes-permit
  
2. How many IU permits (or other control documents) have been issued? 4 SIU & 4 NSIU
  
3. DO ALL SIGNIFICANT IUS HAVE CURRENT (UNEXPIRED) CONTROL DOCUMENTS? IF NOT, LIST ALL UNPERMITTED SIUS, THE DATE OF EXPIRATION OF THEIR PREVIOUS PERMIT (IF APPLICABLE), AND THE REASON FOR DELAY IN ISSUING THE REQUIRED DOCUMENT.  
No: Stateside Steel - Expired November 30, 2009 - Overlooked because the facility rarely discharges
  
4. Does the control document contain the following items?  
 An expiration date: Yes  
 Discharge limitations: Yes  
 If the program requires self-monitoring by the IUs, do the Permits contain:  
 IU self-monitoring requirements: N/A  
 IU reporting requirements: N/A
  
5. Indicate which of the following recommended standard conditions are contained in the control documents:  
**(Reviewed PSC's Permit)**  
 Sample location: Yes  
 Type of sample: Yes  
 Monitoring frequency: Yes  
 Bypass prohibition: Yes  
 Right of entry: Yes  
 Nontransferability: Yes  
 Revocation clause: Yes  
 Penalty Provisions: Yes  
 Slug load notification: Yes  
 Notification of process change: Yes

D. MONITORING OF IUS BY POTW

1. Indicate current inspection and sampling frequency and program requirement below:

	Current frequency:	Program Requirement:
Sampling:		
categorical IUs	<u>1-2/mo</u>	<u>1/yr</u>
Non-SIUs	<u>1-2/mo</u>	<u>1/yr</u>
Inspection:		
Categorical IUs	<u>1/yr</u>	<u>1/yr</u>
Non-SIUs	<u>Not Inspected</u>	<u>1/yr</u>

2. HAS EACH SIU BEEN INSPECTED AND SAMPLED AT THE FREQUENCY REQUIRED BY THE APPROVED PROGRAM? Yes

3. Are inspections announced or unannounced? Both

4. Are records kept of each inspection? Yes

5. Does the inspection report contain an adequate description of the following:

Date and time of inspection: Yes

Officials present: Yes

Inspection of chemical storage areas: Yes

Description of regulated processes, categorical waste streams, and discharge location of these waste streams: Yes

Inspection of the pretreatment facilities: Yes

Review of self-monitoring records: N/A

Observation of IU self-monitoring procedures: N/A

Verification that approved analytical techniques are used: N/A

Verification of IU flow measurement (where required): N/A

6. Overall adequacy of inspection documentation: Inspections are too vague/not specific and are more like a fact sheet than an inspection.



7. DOES THE POTW SAMPLE IUS FOR ALL POLLUTANTS REGULATED IN THEIR PERMITS? (IT IS NOT NECESSARY TO SAMPLE FOR ALL POLLUTANTS EVERY TIME, BUT IT MUST BE DONE PERIODICALLY). Yes

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8. Are analyses performed in accordance with EPA-approved methods (40 CFR 136)? Yes

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9. Are sampling and flow monitoring equipment properly maintained? Yes - sampler for each facility - Flow N/A

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10. Is the POTW keeping proper field notes and chain of custody forms? Yes

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11. Is the sampling location representative of the discharge to the collection system? Yes

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12. Are sampling locations identified in POTW records? Yes

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13. Are sampling services available in an emergency? Yes

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14. What are the POTW's procedures for tracking receipt and review of IU reports, such as BMR's, semi-annual reports, progress reports, bypass reports, and self-monitoring reports? Reports not required; Director of Env. Quality keeps track of violations and required responses to letters.

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15. ARE SELF-MONITORING REPORTS REVIEWED TO VERIFY THAT ANALYSES WERE PERFORMED FOR ALL REGULATED PARAMETERS, AND TO EVALUATE COMPLIANCE WITH EFFLUENT LIMITS? N/A

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16. IF VIOLATIONS ARE FOUND IN REPORTS, DOES THE POTW RESPOND TO ALL VIOLATIONS? N/A

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17. What are the POTW's procedures for following up violations?  
Letter requiring a response, additional action depends on  
nature of violation an corrective action taken; NOV for pH  
Violations are issued immediately onsite.

18. HAS THE POTW REVIEWED BMRS FOR COMPLIANCE WITH 40 CFR  
403.12(b)?: No BMR for PSC

Review a Baseline Monitoring Report from the POTW's file,  
and indicate which of the following items can be identified  
in the BMR: **(Reviewed BMR for Grace Trailer)**

Name and address: Yes

Other environmental permits held: Yes

Description of operations: Yes

Process flow diagrams: Yes

Flow measurements: Yes

Measurements of regulated pollutants: Yes

Certification of compliance by the IU: Yes

Compliance schedule (if needed): N/A

19. Additional comments on the POTW's inspection and sampling  
procedures: \_\_\_\_\_

Strongly recommended that inspections be more facility  
specific and more detailed.

Not all metals were sampled all 4 times.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

E. Enforcement

1. HAS THE POTW IMPLEMENTED ENFORCEMENT RESPONSE PROCEDURES TO ADEQUATELY ADDRESS EVERY IU VIOLATION OF PRETREATMENT STANDARDS AND REQUIREMENTS? Yes - working with Grace Trailer Service

2. How does the POTW respond to the following violations?

Effluent limitations: NOV

Late reports: Letter - Very few reports required

Unpermitted discharges: Letter & depends on circumstances

Slug loads or spills: Letter & NOV

3. IS THE LIST OF SIGNIFICANT VIOLATORS PUBLISHED BY THE POTW DEVELOPED IN ACCORDANCE WITH EPA REGION VI CRITERIA FOR SIGNIFICANT VIOLATING INDUSTRIAL USER (DATED AUGUST 22, 1985)? Yes - Automated Conveyors, Grace Trailer, Nu-Way

4. List the SIUs which have met the criteria for Significant Violator within the last 12 months, and describe the enforcement action which has been taken by the POTW. If construction is required, please indicate whether the IU has been placed on an enforceable compliance schedule.

Name:	Type of Violation:	Enforcement Action:	Compliance Deadline:
<b>Automated Conveyors</b>	<b>Oil and Grease</b>	<b>Only 1 sampling event</b>	
<b>Grace Trailer Service</b>	<b>pH, Oil and Grease, TPH, Mercury</b>	<b>NOV</b>	<b>Pending</b>

5. Comments on the POTW's enforcement procedures:  
POTW should consider additional enforcement action against  
Grace Trailer Service for excessive repeat violations.  
It is strongly recommended that a compliance schedule be  
established if it determined that additional pretreatment  
equipment is required.

F. POTW'S PRETREATMENT ORGANIZATION STRUCTURE

1. Is the program structure essentially the same as that presented in the approved pretreatment program? Yes
2. Are staffing levels adequate? Yes
3. Are the responsible officials familiar with the approved program? Yes

G. MULTIJURISDICTIONAL ISSUES

1. List any IUs which are located outside of the Jurisdictional area of the POTW:  
None
2. Does the POTW have adequate procedures for controlling IUs located outside its jurisdictional area? N/A
3. Does the POTW have copies of permits for IUs in other cities? N/A
4. Have any of these IUs met the criteria for Significant Violator? If so, have they been published by the POTW in its annual list of Significant Violators? N/A
5. Comments on multijurisdictional issues: None



PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: PSC Container Services, LLC

POTW Name: City of West Memphis

Industry Contacts: Marcus Vining

Date and Time of Visit: 2/4/2010 In @ 0940 / Out @ 1005

Description of Manufacturing Process:  
Internal and external truck washing

Sources of Process Wastewater:  
Internal and external truck washing

Categorical Industry? Yes- Transportation equipment cleaning

Basis for Limits: Local sewer ordinance & 40 CFR

Point of Application: Prior to city connection

Description of Pretreatment Equipment and Procedures:  
oil/water separation, DAF, pH adjustment

Spill Prevention and Solvent Management Procedures:  
Chemical storage area with secondary containment; wash areas drain to pretreatment area; \*Overall inadequate\*  
\*See IU visit form for additional information\*

Sampling Location and Equipment:  
PVC Tee in discharge line - not suitable for ease of representative and tamperproof sampling

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Grace Trailer Service

POTW Name: City of West Memphis

Industry Contacts: Chris Fox

Date and Time of Visit: 2/4/2010 In @ 1010 / Out @ 1045

Description of Manufacturing Process:  
Internal and external truck washing

Sources of Process Wastewater:  
Internal and external truck washing

Categorical Industry? Yes- Transportation equipment cleaning

Basis for Limits: Local sewer ordinance & 40 CFR

Point of Application: Prior to city connection

Description of Pretreatment Equipment and Procedures:  
Oil and water separator, pH adjustment, two storage tanks

Spill Prevention and Solvent Management Procedures:  
Curbed concrete pad chemical storage area & all wash bays drain directly to pretreatment equipment

Sampling Location and Equipment:  
Parshall flume located immediately before connection to city sewer; uses a dedicate autosampler supplied by city; completely enclosed and locked to prevent unauthorized access

PPETS CODE SHEET

PRETREATMENT COMPLIANCE INSPECTION (PCI)

		CODE
INSPECTOR'S NAME:	<u>Brent Walker</u>	
NAME OF FACILITY:	<u>West Memphis Wastewater Treatment Facility</u>	
PERMIT NUMBER USED TO TRACK PROGRAM:	<u>AR0022039</u>	NPID
DATE OF PCI:	<u>February 2, 2010</u>	DTIA

PPETS WENDB DATA ELEMENTS

NUMBER OF SIGNIFICANT IUS (SIUS):	<u>4</u>	SIUS
NUMBER OF CATEGORICAL IUS:	<u>4</u>	CIUS
SIUS NOT SAMPLED OR INSPECTED BY POTW:	<u>0</u>	NOIN
SIUS WITHOUT CONTROL MECHANISM:	<u>1</u>	NOCM
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH STANDARDS OR REPORTING:	<u>2</u>	PSNC
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH SELF-MONITORING REQUIREMENTS:	<u>0</u>	MSNC
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH SELF-MONITORING AND NOT INSPECTED OR SAMPLED BY POTW:	<u>0</u>	SNIN





## 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, Ark 72118-5317

Re: Pretreatment Compliance 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 2-4, 2010.

1. PSC Container Services:

We will be addressing these and other issues with PSC Containers.

2. Warren Unilube:

Warren Unilube has submitted their application for discharge along with other documentation and is presently working on a design for the sampling point.

3. Awesome Products:

Awesome Products water consumption is used for a number of products. Their discharge is very little as far as we can tell. They will be evaluated to determine if they should be permitted.

4. Pump Stations: (Mound City and Club Road)

Both pump stations were cleaned on April 26 and 27, 2010. We found this product to be coming from a nearby business. The business had not maintained one of their oil and water separators and the products was discharged to our collection system.

5. Stateside Steel:

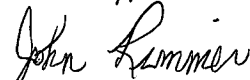
The permit has been reissued.

6. Quarterly samples:

These samples are taken to Environmental Testing and Consulting in Memphis, Tennessee. Spoke to them and got the impression that no one was really sure what had happened. Will not be a problem from now on.

We will continue to address these concerns and correct the deficiencies where needed. If you have any questions, please contact me at (870) 702-5143 or Denise Bosnick, Director Environmental Quality at (870) 702-5141.

Sincerely,



John Rimmer  
General Manager.

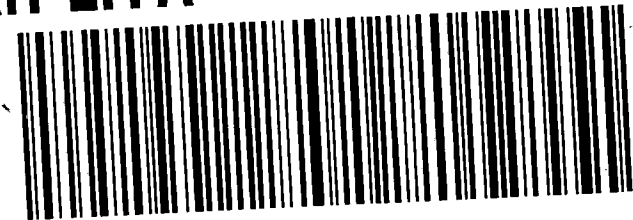
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City WEST MEMPHIS State AR ZIP 72301-3249

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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Address Use this line for the HOLD location address or for continuation of your shipping address.

City North Little Rock State AR ZIP 72118

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