



ARKANSAS
Department of Environmental Quality

June 22, 2011

James Sanders, Mayor
City of Blytheville
P.O. Box 1784
Blytheville, AR 72315

RE: Blytheville WWTP – West – Compliance and SSO Inspections

AFIN: 47-00544

NPDES Permit No.: AR0022560

Dear Mr. Sanders:

On May 23, 25, and 26, 2011, fellow inspector Michael Greenway and I performed a routine compliance inspection and sanitary sewer overflow 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:

Compliance Inspection:

1. A calibration check revealed that the effluent flow meter was underreporting flow by >25%. This violates Part II Section C. Item 2. of the permit. Appropriate flow measurement devices and methods consistent with accepted scientific practices shall be selected and used to insure the accuracy and reliability of measurements of the volume of monitored discharges. The devices shall be installed, calibrated and maintained to insure the accuracy of the measurements are consistent with the accepted capability of that type of device. Devices selected shall be capable of measuring flows with a maximum deviation of less than +/-10% from true discharge rates throughout the range of expected discharge volumes and shall be installed at the monitoring point of the discharge.
2. At the time of the inspection the following Operation and Maintenance Items were noted:
 - a. One of the three clarifiers was out of service.
 - b. One of the clarifier curtains was down.
 - c. The polishing pond curtain was down.These items violate Part II Section B. Item 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

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY

5301 NORTHSHORE DRIVE / NORTH LITTLE ROCK / ARKANSAS 72118-5317 / TELEPHONE 501-682-0744 / FAX 501-682-0880

www.adeq.state.ar.us



2011/08/29 02:27 PM



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2011/08/29 02:27 PM

**CITY OF BLYTHEVILLE
OFFICE OF THE MAYOR**

FACSIMILE TRANSMITTAL SHEET

TO:	FROM:
Rene E. Meints	Felisha Bell
COMPANY:	DATE:
ADEQ	09/07/2011
FAX NUMBER:	TOTAL NO. OF PAGES INCLUDING COVER:
501.682.0880	2
PHONE NUMBER:	SENDER'S REFERENCE NUMBER:
RE:	YOUR REFERENCE NUMBER:
Closing of the Lagoon	

 URGENT PLEASE REPLY PLEASE COMMENT

NOTES/COMMENTS:

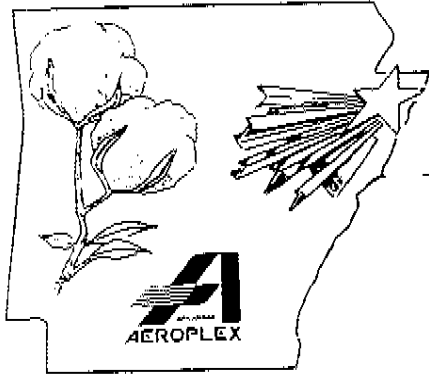
Hello Mrs. Meints,

Here is a fax copy of the letter concerning the development of a closure plan for the Blytheville wastewater lagoons.

Please be advised that the original document will follow by certified mail.

Thank You
Felisha Bell

124 WEST WALNUT STREET
BLYTHEVILLE, AR 72315
PHONE 870-763-3602
FAX 870-762-0443



City of Blytheville

124 West Walnut
Blytheville, Arkansas 72315

OFFICE OF THE MAYOR
JAMES W. SANDERS

September 7, 2011

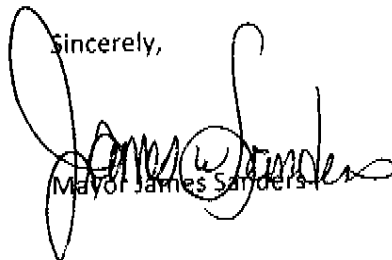
Rene E. Meints
Arkansas Department of Environmental Quality
Water Division – Enforcement Branch
5301 Northshore Drive
North Little Rock, AR 72118-5317

RE: NPDES Permit Numbers AR0022560, AR0022586, AR0022578 Follow up Inspection Responses

Dear Ms. Meints,

I am writing in response to your letter dated August 23, 2011 concerning the development of a closure plan for the Blytheville wastewater lagoons. The City has located the Arkansas Department of Environmental Quality's **Waste Storage Pond Closure Guidelines** and is in the process of developing a closure plan for the City's unused lagoon systems. The first step is to develop a soil testing plan. We have been in discussion with multiple environmental sampling companies about how and where to acquire soil samples in each lagoon. We have been told to contact Stephen Hogan at ADEQ about these testing requirements. As soon as we are able to reach him and develop a soil testing plan, we will proceed with testing the soils and thence developing an overall closure plan. We are requesting that the timeline submittal date be extended from September 9th to October 7th as we are currently unable to furnish this information accurately. Please contact me at 870-763-3602 if you have any questions.

Sincerely,



Mayor James Sanders

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.

3. The **QA/QC** control charts in the laboratory were incorrect. These charts should be setup with Warning Limits and Control Limits for use in evaluating the results of laboratory duplicates and spikes.
4. The fecal coliform incubator/water bath temperature was observed to be below the required temperature of **44.5 (+I-0.2) °C** on at least two occasions during the inspection. It appears this problem was corrected by moving the incubator to different location where it was more protected from the flow of cold air from the air conditioner; however multiple checks should be performed to insure the required temperature is consistently maintained.
5. The composite samples collected for the analysis of ammonia nitrogen (**NH₃-N**) were not being properly preserved. Following the collection of the final aliquot, samples should immediately be preserved with sulfuric acid (**H₂SO₄**) and stored at less than **6 °C** until analyzed. Currently, collection of the samples is completed by early afternoon but they are not preserved with sulfuric acid. They are sitting unpreserved until they are analyzed the following day.
6. The sludge storage **lagoon(s)** were not being properly operated and maintained. The levees and other dry portions of these lagoons should be mowed regularly to prevent the growth of woody vegetation and discourage burrowing animals which can weaken the integrity of the levees. Additionally, the current excessive growth of vegetation prevents visual inspection for the detection of leaks, seeps, and other illicit discharges. As discussed previously, you may wish to permanently close out portions of the **sludge** storage lagoons to reduce the area that must be maintained. Please contact the Permits Branch for specific requirements related to closure of portions of these lagoons.

SSO Inspection:

You should continue working to comply with the current Consent Administrative Order (CAO) requiring you to evaluate, repair and upgrade the collection system including the installation of emergency backups and remote monitoring.


The above items require your immediate attention. Please submit a written response to these findings to the Water Division Enforcement Branch of this Department. This response should be mailed to the address below and 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 2, 2011.

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

James Sanders, Blytheville WWTP - West
June 22, 2011
Page 3

If I can be of any assistance, please contact me at walker@adeq.state.ar.us or 870-935-7221 ext.-12.

Sincerely,



Brent L. Walker
District 3 Field Inspector
Water Division

cc: Water Division Enforcement Branch
Water Division Permits Branch



Form Approved
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	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="5"/> <input type="text" value="6"/> <input type="text" value="0"/> 11 <input type="text" value="1"/> 12 <input type="text" value="1"/> <input type="text" value="1"/> <input type="text" value="0"/> <input type="text" value="5"/> <input type="text" value="2"/> <input type="text" value="3"/> 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"/>	74 <input type="text"/> 75 <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 (<i>For industrial users discharging to POTW, also include POTW name and NPDES permit number</i>) Blytheville WWTP - West 4951 NCR 635 Blytheville, AR Mississippi Co.	Entry Time/Date 1400 5/23/2011 0830 5/25/2011	Permit Effective Date 12/1/2005
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) James Yankee/Pretreatment Coordinator/870-763-4961 Kenneth Ellis/Waste Water Superintendent/870-763-4961	Other Facility Data	
Name, Address of Responsible Official/Title/Phone and Fax Number James Sanders/Mayor/870-763-3602 Blytheville WWTP - West P.O. Box 1784 Blytheville, AR 72315	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)

S	Permit	N	Flow Measurement	U	Operations & Maintenance	N	Sampling
S	Records/Reports	N	Self-Monitoring Program	N	Sludge Handling/Disposal	N	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)

This SSO inspection was conducted during the course of a routine CEI.

See the attached inspection report and the letter accompanying the corresponding CEI for additional information.

Name(s) and Signature(s) of Inspector(s) Brent L. Walker	Agency/Office/Telephone/Fax AR Dept. of Environmental Quality-Jonesboro (870) 935-7221 ext. 12/(870) 935-4715 (Fax)	Date May 27, 2011
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: Shallow gravity flow and force main system		
POPULATION SERVED/NUMBER OF RESIDENTIAL AND COMMERCIAL CONNECTIONS: ~15,000 Pop (Total)		
FEET OF SEWER SYSTEM: 119.64 miles ~45% of total for 3 plants		
AGE OF SYSTEM: ~1953 and newer		
DOES THE SYSTEM EXPERIENCE PROBLEMS DURING DRY OR WET WEATHER (EXPLAIN): High groundwater and I&I in wet weather	<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): Superintendent is informed of all overflows and is responsible for reporting 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 known are reported and available in ADEQ Enforcement Database	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE	
PUMP STATIONS		
NUMBER OF PUMP STATIONS IN SYSTEM: 17		NUMBER WITH BACKUP POWER: 0
HOW OFTEN ARE PUMP STATIONS INSPECTED/MONITORED: Twice/day (1/day on weekends)		
ARE MAINTENANCE RECORDS AND/OR OPERATOR LOGS KEPT: Yes		
ADEQUATE INVENTORY OF SPARE PARTS: Yes		
TYPE OF REMOTE ELECTRONIC MONITORING USED (I.E. SCADA OR AUTO DIALERS): None		
BRIEF SUMMARY OF EMERGENCY PROCEDURES: Priority service from power company		
NUMBER OF PUMP STATIONS VISITED DURING INSPECTION (SEE ATTACHED CHECKLISTS FOR EACH): 2		
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:		

PUMP STATION VISIT (COMPLETE A SEPARATE CHECKLIST FOR EACH PUMP STATION VISITED)	
GENERAL INFORMATION AND OVERALL EVALUATION	<input type="checkbox"/> S <input type="checkbox"/> M <input checked="" type="checkbox"/> U <input type="checkbox"/> NA
NAME AND/OR LOCATION OF PUMP STATION: 820 Lift Station (Located on Airbase)	
TYPE(S) OF WASTE WATER RECEIVED: <input checked="" type="checkbox"/> RESIDENTIAL <input checked="" type="checkbox"/> COMMERCIAL <input checked="" type="checkbox"/> INDUSTRIAL <input type="checkbox"/> OTHER:	
NUMBER OF PUMPS: <u>2</u>	NUMBER OPERATIONAL: <u>2</u>
NUMBER AND SIZE OF PUMPS APPEARS ADEQUATE:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
EVIDENCE OF RECENT OVERFLOWS OR HIGH LEVELS:	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
GENERAL OPERATION AND MAINTENANCE	
<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA	
CLEAN AND WELL MAINTAINED WITH MINIMAL STORAGE OF UNRELATED EQUIPMENT:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
GATES/DOORS/HATCHES/LIDS/ETC. LOCKED TO PREVENT UNAUTHORIZED ACCESS AND/OR TAMPERING:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
WET WELLS, SUMPS AND PITS ADEQUATELY COVERED, GRATED OR OTHERWISE PROTECTED:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
ELECTRICAL CONTROLS COVERS CONDUIT AND EQUIPMENT PROPERLY INSTALLED AND MAINTAINED:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
GUARDS AND SHIELDS IN PLACE AROUND MOVING EQUIPMENT (BELTS, PULLEYS, DRIVESHAFTS, ETC.):	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
ADEQUATE VENTILATION TO PREVENT EXCESSIVE CONDENSATION AND/OR GASES AND FUMES:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
ADEQUATE LIGHTING FOR ROUTINE INSPECTION/MAINTENANCE:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
SEALS, VALVES AND PACKING ADEQUATELY MAINTAINED TO PREVENT LEAKS:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
MINIMAL ACCUMULATION OF GREASE AND SOLIDS IN WET WELLS:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
BACKUP POWER AND ALARMS	
<input type="checkbox"/> S <input type="checkbox"/> M <input checked="" type="checkbox"/> U <input type="checkbox"/> NA	
PROVISIONS FOR GENERATOR AND/OR EMERGENCY TRANSFER PUMP:	<input type="checkbox"/> S <input type="checkbox"/> M <input checked="" type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
AUDIBLE/VISUAL ALARM WITH EMERGENCY CONTACT INFORMATION POSTED:	<input type="checkbox"/> S <input type="checkbox"/> M <input checked="" type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
SCADA SYSTEM (LIST PARAMETERS MONITORED):	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE

PUMP STATION VISIT (COMPLETE A SEPARATE CHECKLIST FOR EACH PUMP STATION VISITED)	
GENERAL INFORMATION AND OVERALL EVALUATION	<input type="checkbox"/> S <input type="checkbox"/> M <input checked="" type="checkbox"/> U <input type="checkbox"/> NA
NAME AND/OR LOCATION OF PUMP STATION: Shop	
TYPE(S) OF WASTE WATER RECEIVED: <input checked="" type="checkbox"/> RESIDENTIAL <input checked="" type="checkbox"/> COMMERCIAL <input checked="" type="checkbox"/> INDUSTRIAL <input type="checkbox"/> OTHER:	
NUMBER OF PUMPS: <u>3</u>	NUMBER OPERATIONAL: <u>3</u>
NUMBER AND SIZE OF PUMPS APPEARS ADEQUATE:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
EVIDENCE OF RECENT OVERFLOWS OR HIGH LEVELS:	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
GENERAL OPERATION AND MAINTENANCE	
CLEAN AND WELL MAINTAINED WITH MINIMAL STORAGE OF UNRELATED EQUIPMENT:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
GATES/DOORS/HATCHES/LIDS/ETC. LOCKED TO PREVENT UNAUTHORIZED ACCESS AND/OR TAMPERING:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
WET WELLS, SUMPS AND PITS ADEQUATELY COVERED, GRATED OR OTHERWISE PROTECTED:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
ELECTRICAL CONTROLS COVERS CONDUIT AND EQUIPMENT PROPERLY INSTALLED AND MAINTAINED:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
GUARDS AND SHIELDS IN PLACE AROUND MOVING EQUIPMENT (BELTS, PULLEYS, DRIVESHAFTS, ETC.):	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
ADEQUATE VENTILATION TO PREVENT EXCESSIVE CONDENSATION AND/OR GASES AND FUMES:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
ADEQUATE LIGHTING FOR ROUTINE INSPECTION/MAINTENANCE:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
SEALS, VALVES AND PACKING ADEQUATELY MAINTAINED TO PREVENT LEAKS:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
MINIMAL ACCUMULATION OF GREASE AND SOLIDS IN WET WELLS:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
BACKUP POWER AND ALARMS	
PROVISIONS FOR GENERATOR AND/OR EMERGENCY TRANSFER PUMP:	<input type="checkbox"/> S <input type="checkbox"/> M <input checked="" type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
AUDIBLE/VISUAL ALARM WITH EMERGENCY CONTACT INFORMATION POSTED:	<input type="checkbox"/> S <input type="checkbox"/> M <input checked="" type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
SCADA SYSTEM (LIST PARAMETERS MONITORED):	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE

MAYOR:
James Sanders

CITY COUNCIL:
John Musgraves
Stan Parks
Shirley Overman
Monte Hodges
Mylas Jeffers
Missy Langston

ATTORNEY:
Mike Bearden

**PUBLIC UTILITIES
DIRECTOR:**
Rick Mosley

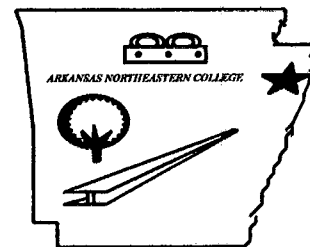
SUPERINTENDENT:
Kenneth Ellis

Blytheville Wastewater Dept.

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

Phone: (870) 763-4961

Fax: (870) 763-8541



June 28, 2011

ADEQ
NPDES Enforcement Branch
5301 Northshore Drive
North Little Rock, AR 72118-5317

INSPECTION RESPONSE

RE: West Compliance and SSO Inspections

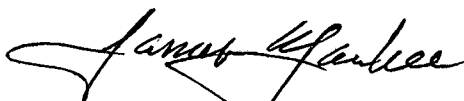
AFIN: 47-00544 NPDES Permit No: AR0022560

- 1.) The effluent flow meter is operating properly. Large amounts of rain caused hydraulic overloads to the treatment plant causing the flow meter sensor to mis-read the actual flow being discharged. Continuing inflow and infiltration repairs to the collection system should eliminate large flow fluctuations through this treatment plant. The ultrasonic sensor will not read flows within 1 foot of the sensor.
- 2.) (A)&(B) We have no way to take a single clarifier out of service without shutting the entire plant down. The turnbuckle holding the clarifier curtain had become detached. It was repaired immediately.
- (C) We will be replacing the polishing pond curtain. A small one is in place at this time until we can get the old one replaced.
- 3.) QA/QC control charts have been switched to duplicates and spikes utilizing warning and control limits on these only.
- 4.) The fecal coliform incubator/water bath was moved to a different location in the lab where the air conditioner is not prohibiting temperature and is being checked multiple times throughout the day to insure the required

temperature is maintained.

- 5.) Composite samples collected for the ammonia nitrogen analysis is being collected and preserved with sulfuric acid the same day, compositing has finished at 3:00 p.m. and stored in the lab at 4C until they can be analyzed the next morning.
- 6.) We will evaluate the area needed for sludge storage and contact the Permits Branch for closure of portions of the sludge lagoons.

Sincerely,

A handwritten signature in cursive script, appearing to read "James Yankee".

James Yankee
Pretreatment Coordinator

Blytheville Wastewater

PO Box 1784
Blytheville, AR 72316-1784

CERTIFIED MAIL™



7006 2150 0003 2715 3725



UNITED STATES
POSTAL SERVICE



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72118

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72315
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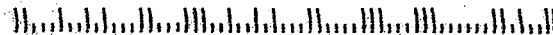
\$5.59

00082719-06

**ADEQ
NPDES Enforcement
5301 Northshore Drive
North Little Rock, AR 72118-5317**

**RETURN RECEIPT
REQUESTED**

72118\$5317 R015





A R K A N S A S
Department of Environmental Quality

July 21, 2011

City of Blytheville, WWTP
Attention: Honorable James Sanders
P.O. Box 1784
Blytheville, AR 72315

RE: NPDES Permit Number AR0022560, AR0022586, AR0022578,
WWTFs Inspection Responses

Dear Mayor Sanders:

AR0022560 – West Plant, Compliance Inspection Response

The Department has received your response to the May 23, 25, and 26, 2011 compliance inspection of your WWTP by our District Field Inspectors, Brent L. Walker and Michael Greenway. Your response has been deemed deficient for the following reasons:

1. Response #1, did not address when calibration of the equipment was conducted. Please submit documentation confirming calibration dates. It may take several years to complete the corrections to Blytheville's I&I issues, so it may be necessary to update the equipment in order to monitor flow during large rain events.
2. Response #2 (C) needs a deadline, a specific date, when the polishing pond curtain will be replaced. Has a new one been ordered? Please send a report when the new curtain has been installed, and a photograph as evidence that the work has been completed.
3. Response #6 needs a timeline with specific dates when the lagoons will be evaluated, when the closure procedure will begin and when maintenance of the remaining lagoons will be completed. When maintenance has been completed on the remaining lagoons, please send photographs reflecting the corrections.

AR0022560 – West Plant, Pretreatment Compliance Inspection Response

The Department has received your response to the May 26, 2011 pretreatment compliance inspection of your WWTF by our District Field Inspectors, Brent L. Walker and Michael Greenway. Your response has been deemed deficient for the following reasons:

1. Response #1, submit an updated IUS.

July 21, 2011
Page 2
Honorable James Sanders

2. Response #3 did not address the reason why the other parameters required by the permit were not sampled.
3. Response #4 the proof of publication needs to be submitted with this response.

AR0022586 – North Plant, Compliance Inspection Response

The Department has received your response to the May 25, 2011 compliance inspection of your WWTF by our District Field Inspectors, Brent L. Walker and Michael Greenway. Your response has been deemed deficient for the following reasons:

- Response #4 needs a timeline with specific dates when the lagoons will be evaluated, when the closure procedure will begin and when maintenance of the remaining lagoons will be completed. When maintenance has been completed on the remaining lagoons, please send photographs reflecting the corrections.

AR0022586 – North Plant, SSO Inspection Response

The Department has received your response to the May 25, 2011 SSO inspections by our District Field Inspectors, Brent L. Walker and Michael Greenway. Your response has been deemed deficient for the following reasons:

- Response #2 needs a timeline with specific dates when the Lockard Street pump station will be upgraded. Please, submit an update report when the project has been completed.

AR0022578 – South Plant, Compliance Inspection Response

The Department has received your response to the May 23, 25, and 26, 2011 compliance inspection of your WWTP by our District Field Inspectors, Brent L. Walker and Michael Greenway. Your response has been deemed deficient for the following reasons:

1. Response #2, did not address when calibration of the equipment was conducted.
2. Response #6 needs a timeline with specific dates when the lagoons will be evaluated, when the closure procedure will begin and when maintenance of the remaining lagoons will be completed. When maintenance has been completed on the remaining lagoons, please send photographs reflecting the corrections.

ADEQ Staff has scheduled a meeting with the City of Blytheville to begin at 1:00 p.m. on August 9, 2011. ADEQ's office location is 5301 Northshore Drive, North Little Rock, AR 72118.

July 21, 2011

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Honorable James Sanders

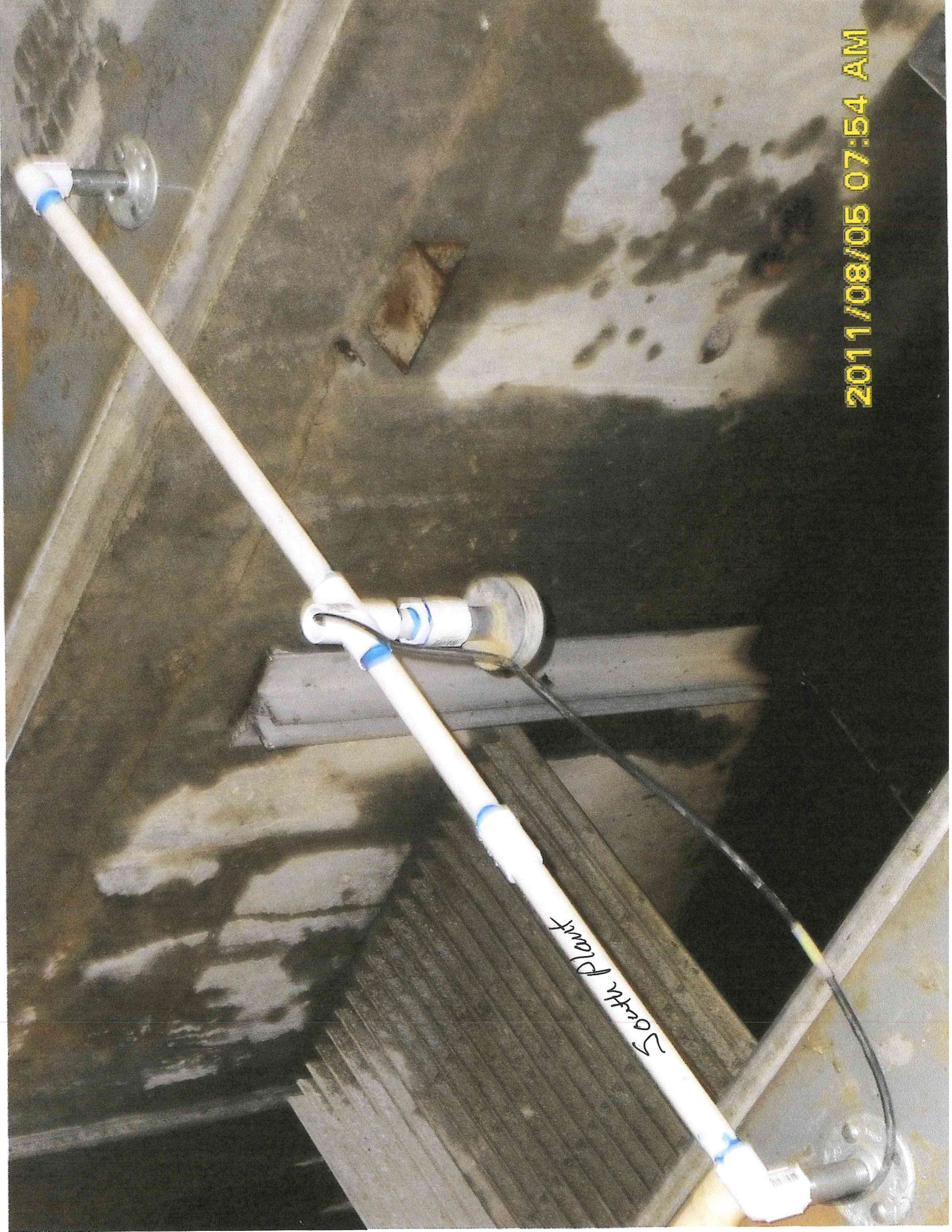
Please bring a sufficient response to the inspections, a copy of the City of Blytheville's CAO (LIS 08-094), and the documents requested in said Oder.

A copy of the inspection reports and the inadequate responses are included with this letter for your review. Thank you for your attention to this matter. Should you have any questions, call 501-682-0631 or e-mail meints@adeq.state.ar.us.

Sincerely,



René E. Meints
Enforcement Analyst
Water Division Enforcement Branch



South Plant

2011/08/05 07:54 AM

West Plant
Ultra Sonic Flow Sensor

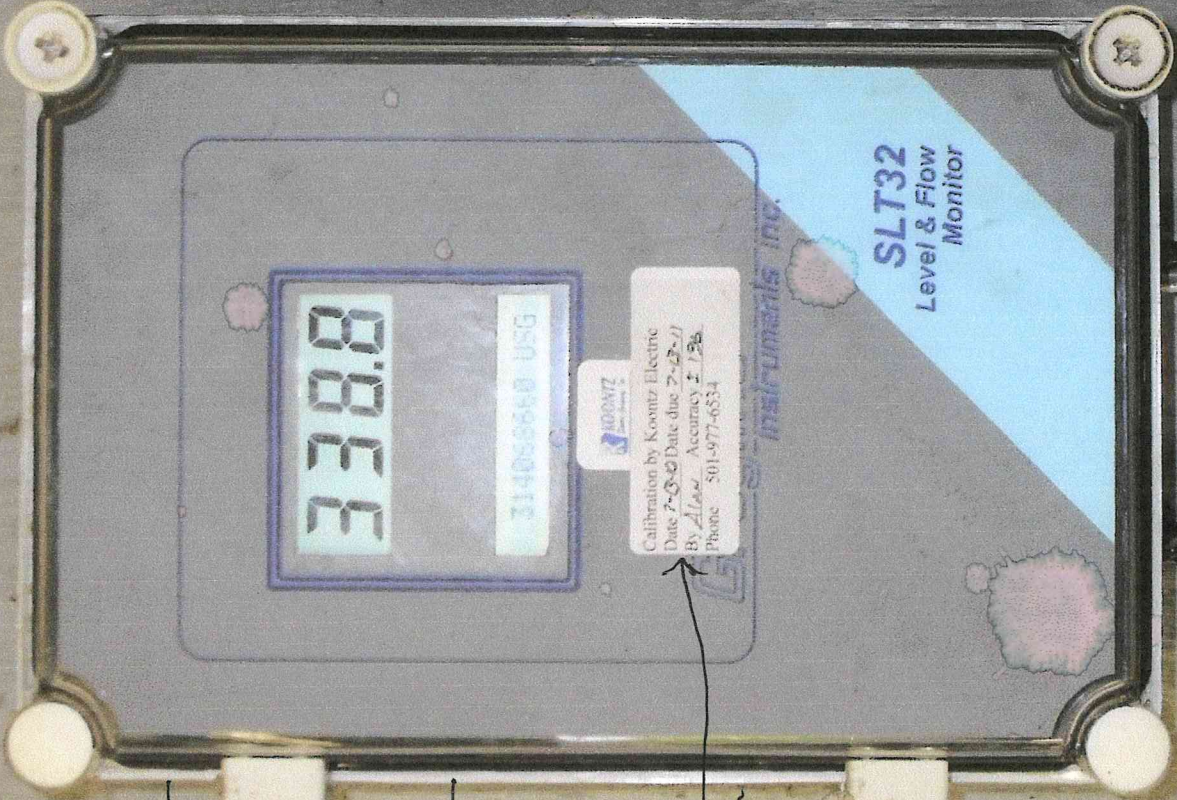
2011/07/25 01:45 PM

West Plant
Flow Monitor

Outside Source
Calibration

7/13/2010

Operators
check calibration
weekly



Calibration by Koomitz Electric
Date 7-13-10 Date due 7-13-11
By Alan Accuracy ± 1.5%
Phone 501-977-6534

SLT32
Level & Flow
Monitor

1055600 33

ADAPTIONS

17.14	0.074	1.306
17.162	0.076	1.314
17.184	0.078	1.322
17.206	0.080	1.330
17.228	0.082	1.338
17.250	0.084	1.346
17.272	0.086	1.354
17.294	0.088	1.362
17.316	0.090	1.370
17.338	0.092	1.378
17.360	0.094	1.386
17.382	0.096	1.394
17.404	0.098	1.402
17.426	0.100	1.410
17.448	0.102	1.418
17.470	0.104	1.426
17.492	0.106	1.434
17.514	0.108	1.442
17.536	0.110	1.450
17.558	0.112	1.458
17.580	0.114	1.466
17.602	0.116	1.474
17.624	0.118	1.482
17.646	0.120	1.490
17.668	0.122	1.498
17.690	0.124	1.506
17.712	0.126	1.514
17.734	0.128	1.522
17.756	0.130	1.530
17.778	0.132	1.538
17.800	0.134	1.546
17.822	0.136	1.554
17.844	0.138	1.562
17.866	0.140	1.570
17.888	0.142	1.578
17.910	0.144	1.586
17.932	0.146	1.594
17.954	0.148	1.602
17.976	0.150	1.610
18.000	0.152	1.618
18.022	0.154	1.626
18.044	0.156	1.634
18.066	0.158	1.642
18.088	0.160	1.650
18.110	0.162	1.658
18.132	0.164	1.666
18.154	0.166	1.674
18.176	0.168	1.682
18.198	0.170	1.690
18.220	0.172	1.698
18.242	0.174	1.706
18.264	0.176	1.714
18.286	0.178	1.722
18.308	0.180	1.730
18.330	0.182	1.738
18.352	0.184	1.746
18.374	0.186	1.754
18.396	0.188	1.762
18.418	0.190	1.770
18.440	0.192	1.778
18.462	0.194	1.786
18.484	0.196	1.794
18.506	0.198	1.802
18.528	0.200	1.810
18.550	0.202	1.818
18.572	0.204	1.826
18.594	0.206	1.834
18.616	0.208	1.842
18.638	0.210	1.850
18.660	0.212	1.858
18.682	0.214	1.866
18.704	0.216	1.874
18.726	0.218	1.882
18.748	0.220	1.890
18.770	0.222	1.898
18.792	0.224	1.906
18.814	0.226	1.914
18.836	0.228	1.922
18.858	0.230	1.930
18.880	0.232	1.938
18.902	0.234	1.946
18.924	0.236	1.954
18.946	0.238	1.962
18.968	0.240	1.970
18.990	0.242	1.978
19.012	0.244	1.986
19.034	0.246	1.994
19.056	0.248	2.002
19.078	0.250	2.010
19.100	0.252	2.018
19.122	0.254	2.026
19.144	0.256	2.034
19.166	0.258	2.042
19.188	0.260	2.050
19.210	0.262	2.058
19.232	0.264	2.066
19.254	0.266	2.074
19.276	0.268	2.082
19.298	0.270	2.090
19.320	0.272	2.098
19.342	0.274	2.106
19.364	0.276	2.114
19.386	0.278	2.122
19.408	0.280	2.130
19.430	0.282	2.138
19.452	0.284	2.146
19.474	0.286	2.154
19.496	0.288	2.162
19.518	0.290	2.170
19.540	0.292	2.178
19.562	0.294	2.186
19.584	0.296	2.194
19.606	0.298	2.202
19.628	0.300	2.210
19.650	0.302	2.218
19.672	0.304	2.226
19.694	0.306	2.234
19.716	0.308	2.242
19.738	0.310	2.250
19.760	0.312	2.258
19.782	0.314	2.266
19.804	0.316	2.274
19.826	0.318	2.282
19.848	0.320	2.290
19.870	0.322	2.298
19.892	0.324	2.306
19.914	0.326	2.314
19.936	0.328	2.322
19.958	0.330	2.330
19.980	0.332	2.338
20.002	0.334	2.346

USG
FLOW MONITOR
MEASUREMENT INCREASES WITH INCREASE IN FLOW RATE

2011/07/25 01:45 PM

West Plant
Bibishing Basin

New Curtain

Existing Curtain

2011/07/25 01:47 PM



PROOF OF PUBLICATION

STATE OF ARKANSAS]
County of Mississippi,] SS.

David Tenyson
states on oath that he is the publisher of the Blytheville Courier News,
a newspaper published in the city of Blytheville, Mississippi County,
Arkansas, that said paper has a bona-fide circulation in

said county and state, that the annexed Notice

was published for 1 time(s) successively, as follows:

First publication was in the issue of June 30

20 11, and the last publication was in the issue of _____

_____, 20_____
David Tenyson
Publisher.

Number squares _____ Printers Fee \$ 18.75

Received Payment _____

Sworn to before me this 30 day June, 2011

By Sharon J. Dale

PUBLIC NOTICE

OF SIGNIFICANT NONCOMPLIANCE
OF THE CITY OF BLYTHEVILLE'S
INDUSTRIAL PRETREATMENT PROGRAM REGULATIONS

Under the Provisions of 40 CFR 403.8 (f) (VII), enforcement of National Pretreatment Standards and the City of Blytheville's Industrial Pretreatment Ordinance No. 1584, the public is hereby notified that during 2010 the following industry was in significant noncompliance with EPA pretreatment and requirements as specified below.

INDUSTRY: KAGOME CREATIVE FOODS, INC.
ADDRESS: 2705 CASPER
BLYTHEVILLE, AR 72315

INDUSTRY OFFICIAL: MS. NITA REAMS
TITLE: HUMAN RESOURCE MANAGER
SIC NUMBER: 3321 & 3494
PRODUCT: MANUFACTURES FOOD
SPICES AND SAUCES

NATURE OF VIOLATION(S):
CAUSED LARGE AMOUNTS OF OIL AND GREASE TO
ACCUMULATE IN THE CITY'S PUMPING STATION AND PASS
THROUGH TO THE WEST TREATMENT PLANT FOR A
PROLONGED PERIOD OF TIME
DATE(S) OF OCCURRENCE: MAY 2009 THRU MARCH 2010

APPLICABLE ORDINANCE: CITY ORDINANCE # 1594
ENFORCEMENT ACTION TAKEN: KAGOME CREATIVE FOODS,
INC. WAS NOTIFIED IN WRITING OF THE VIOLATIONS AND
AN ADMINISTRATIVE ORDER WAS ISSUED IN JULY 2009
REQUIRING KAGOME TO INSTALL AN ADEQUATE
GREASE REMOVAL SYSTEM.

COMMENTS: WHILE KAGOME CREATIVE FOODS, INC. WAS IN
SIGNIFICANT NONCOMPLIANCE IT DID CAUSE HARM AND
OPERATIONAL PROBLEMS TO THE WEST TREATMENT PLANT
KAGOME HAS BEEN IN COMPLIANCE FROM THE START OF
2010.

DATE: June 15, 2009
SIGNED: James Yankee
Pretreatment Coordinator

Closed
July 1, 2011

(Attachment B.3.)

(Attachment #1.)



ENVIRONMENTAL PROCESS SYSTEMS

P. O. BOX 2436 * CONWAY, AR 72033

501-513-2540 * FAX 501-513-2541

Thursday, July 28, 2011

James Yankee
Blytheville Wastewater Dept.
P. O. Box 1784
4839 North, County Rd. #639
Blytheville, AR 72315

Re: Lagoon Curtain

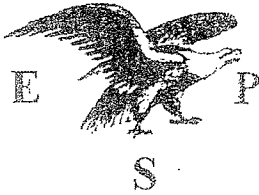
Dear James:

Per our conversation last week, we have one diversion curtain on order for your West WWTP based on your purchase order # 146626. The curtain is curtain in fabrication and is expected to be delivered the second or third week of August.

Thanks for your business.

Sincerely,

Dwight Witcher



ENVIRONMENTAL PROCESS SYSTEMS

P. O. BOX 2436 * CONWAY, AR 72033
501-513-2540 * FAX 501-513-2541

PROPOSAL

Quote No. 11-3030

Blytheville Wastewater Dept.
P. O. Box 1784
Blytheville, AR, 72315
James Yankee

Date: 7-8-11
Reference: West WWTP Curtain

We are pleased to offer the following for your consideration:

All tool, labor, materials, and equipment remove and replace one lagoon curtain at West wastewater plant. Curtain to be 197' long at surface with end slopes cut to match drawings provided by owner. Curtain also to have one flow-through window per drawings. New curtain to be weighted with 100# concrete ballast every 30 feet.

Disposal of old curtain by owner.

Investment \$ 17,250

FOB: job site
Delivery: 4-5 weeks

Sales taxes exempt.

Sincerely

Dwight Witcher
Dwight Witcher

Post-it® Fax Note	7671	Date	7-11-11	# of pages	1
To	James Yankee	From	Dwight W.		
Co./Dept.		Co.			
Phone #		Phone #			
Fax #	870 763-8541	Fax #			

ADEQ

ARKANSAS
Department of Environmental Quality

MEETING ATTENDANCE

DATE: Aug. 9, 2011

FACILITY: City of Blytheville
North, South, West

Name	Organization	E-Mail Address	Telephone Number
Rene' Meints	ADEQ	meints@adeq.state.ar.us	501-682-0631
Loretta Reiber	ADEQ	reiber@adeq.state.ar.us	501-682-0612
MARILYN STOUT	ADEQ	stout@adeq.state.ar.us	501-682-0630
Sandra Farmer	ADEQ	farmers@adeq.state.us	501-682-0631
Allen Gilliam	"	gilliam@ " "	682-0625
Deb Gerst	"	gerst@adeq.state.us	682-0638
Nanette Neal	ADEQ	neal@adeq.state.us	
KENNELLY	Bly Sewer		870-780-5884
James Yankee	Bly Sewer	jlyankee72315@yaho.com	(870) 763-4961
Deniel Bowling	SSR	dbowling@ssr-inc.com	(901) 683-3900
Brad Davis	SSR	bdavis@ssr-inc.com	(901) 683-3900
James W. Sanders	City of Blytheville	msanders@stcql.com	(870) 763-3602

REMARKS:

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY

5301 NORTHSHORE DRIVE / NORTH LITTLE ROCK / ARKANSAS 72118-5317 / TELEPHONE 501-682-0744 / FAX 501-682-0880
www.odeq.state.or.us

August 8, 2011

ADEQ
NPDES Enforcement Branch
5301 Northshore Drive
North Little Rock, AR 72118-5317

INSPECTION RESPONSE

RE: West Plant, Compliance Inspection Response

AFIN: 47-00544 NPDES Permit No: AR0022560

A.1.) The effluent flow meter is operating properly. The City's wastewater operators manually measure the water depth daily. We will raise the ultrasonic sensor approximately 1 foot above the highest expected water level to accurately measure the flow during large rain or flooding events. The flow meters are calibrated annually by Koontz Electric Company. Last calibration was on July 27, 2011. (Attachment A.1.)

A.2.) We will be replacing the polishing pond curtain possibly by the third week of August 2011. The curtain is currently being manufactured and was purchased from Environmental Process Systems of Conway, AR. (Attachment A.2.)

A small one is in place at this time until we can get the old one replaced.

Handwritten note:
If
only
picture?

A.3.) We will evaluate the area needed for sludge storage and contact the Permits Branch for closure of portions of the sludge lagoons. ?????
Needs to be discussed.

West Plant, Pretreatment Compliance Inspection Response

B.1.) (Attachment B.1.)

B.2.) Changes had been made to Omnium's permit limitations removing Oil & Grease limits and BOD5 limits prior to Mr. Walkers inspection. Changes had not been made in Omnium's permit file at the time of the inspection. Also the sample in question was collected and analyzed for pesticides and metals due to the type of pesticides being formulated at the time which contains zinc. These samples were collected to "test" the carbon filters to insure compliance with permit limits.

Omnium also batch discharges its wash waters (approximately 4500 to 5000 gals.) after treatment, in-house testing, and approval from the Pretreatment Coordinator. These test results are submitted via email prior to any discharge approval.

(Attachment B.2.)

B.3.) (Attachment B.3.)

North Plant, Compliance Inspection Response

C.1.) (Attachment C.1.) Sludge storage lagoons. N,S,W

North Plant, SSO Inspection Response

D.1.) Lockard Street pump station. Possibly in the next 2 years.

South Plant, Compliance Inspection Response

E.1.) (Attachment A.1.)

E.2.) (Attachment E.2.) Sludge storage lagoons N,S,W

Sincerely,

James Yankee
Pretreatment Coordinator

(Attachment A.1.)



1223 East Broadway * P.O. Box 501 * Morrilton, AR 72110
(501) 354-2526 * Fax (501) 354-2582 * Website www.koontzelectric.com

BLYTHEVILLE WWTP
PO BOX 1784
BLYTHEVILLE, AR 72316

INVOICE ID: 1111660601
DRAW ID: 5490
DATE: August 1, 2011
SALESPERSON:
CUSTOMER ID: BLYT
PO #: VERBAL: JAMES YANKEE

CONTRACT ID: 111166
INSTRUMENT SERVICES
LOCATION: BLYTHEVILLE, AR

DESCRIPTION OF WORK: CALIBRATED EFFLUENT METERS AT WEST, SOUTH, AND NORTH PLANTS

Agreement Price

700.00

Invoice Sub-total

700.00

Amount due this invoice

\$700.00

Thank you for your Business



1223 East Broadway • P.O. Box 501 • Morrilton, AR 72110 • (501) 354-2526 • Fax (501) 354-2580 • http://www.koontzelectric.com

Benny Koontz
President

Boe Dickey
Technical Services Manager

CALIBRATION CERTIFICATION

FACILITY: Blytheville WWTPs

This is to certify that the following equipment was calibrated on:

DATE: 7-27-11 **WORK ORDER NO.:** 006

BY: Alan Dickey

Equipment Calibrated:

EQ. NO.	EQUIPMENT DESCRIPTION	EQUIPMENT SERIAL NO.
1.	<u>Greyline 5LT-32</u>	<u>Westplant</u>
2.	<u>Greyline 5LT-32</u>	<u>South plant</u>
3.	<u>Greyline 5LT-32</u>	<u>North Plant</u>
4.		
5.		

Calibration Equipment Used:

EQ. NO.	CALIBRATION EQUIPMENT DESCRIPTION	CALIBRATION EQ. SERIAL NO. / NIST NO.
1.	<u>Isco Flume + weir Book</u>	
2.	<u>Metal Ruler 1/16" grads</u>	
3.	<u>Martel 4-20 mA calibrator</u>	
4.		
5.		

I certify that the above calibrated equipment is accurate within the manufacturers' specified tolerances or as follows:

Took Average of measured vs indicated flows
resulting accuracy is ±1%

TECHNICIAN: Alan Dickey **DATE:** 7-27-11

Make a copy for Koontz's File

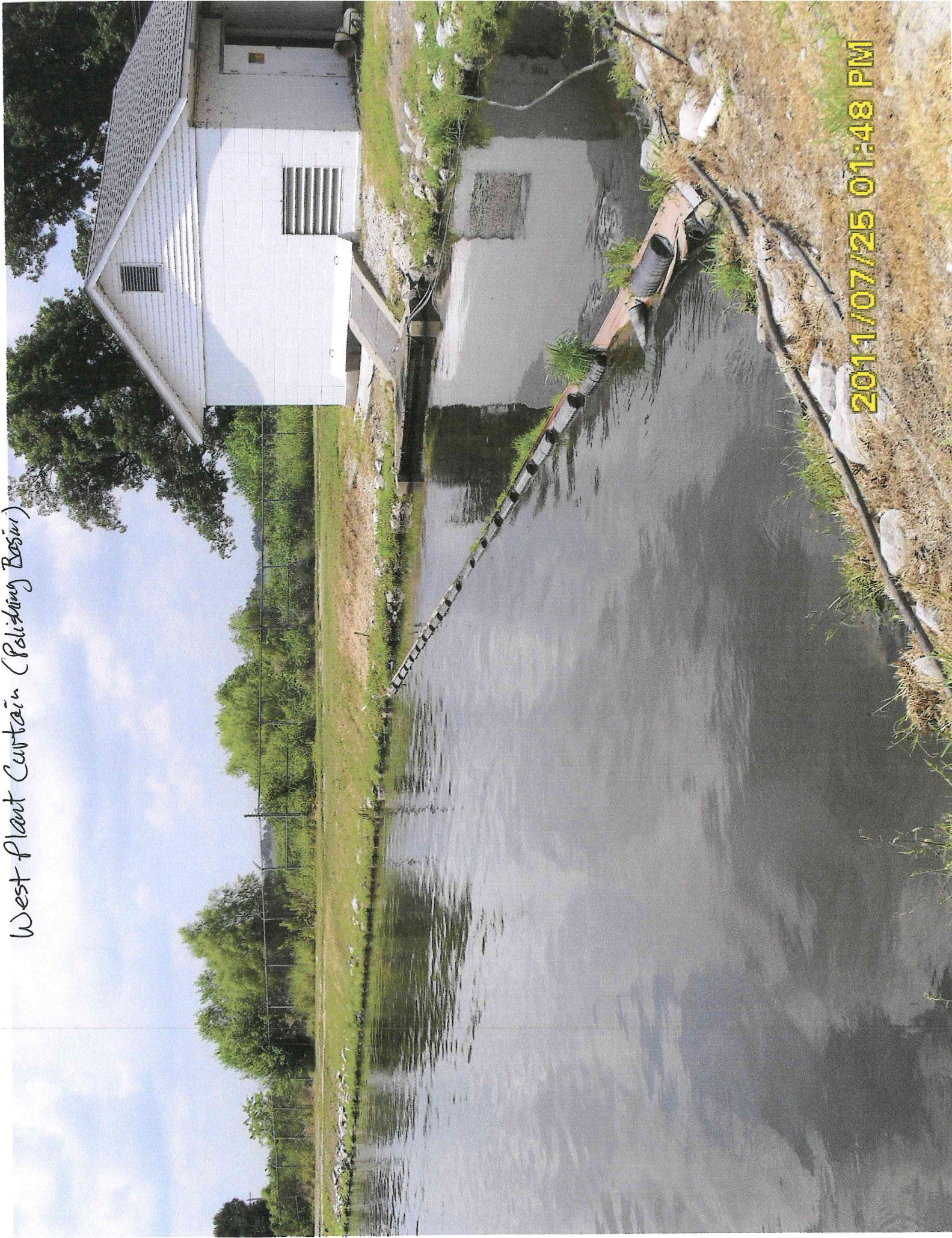
West Plant Polishing Basin

New Curtain
will go here

2011/07/25 01:48 PM



West Plant Curtain (Polishing Basin)



2011/07/25 01:48 PM

(Attachment H. J.)



West Treatment Plant & Sludge Storage Lagoon
4 @ 32.4 acres each

(Attachment B.2.)



South Treatment Plant & Sludge Storage Lagoon
4 @ 35.5 acres each

Meints, Rene

From: James Yankee <jlyankee72315@yahoo.com>
Sent: Tuesday, September 13, 2011 10:01 AM
To: Meints, Rene
Subject: West Plant curtain installation
Attachments: westcurtain 005.jpg

Follow Up Flag: Follow up
Flag Status: Flagged

Rene,

I have attached a photo of our West plant curtain installed on September 9, 2011.
If you need more photos or more info let me know.

James



2011/09/13 08:20 AM