



ARKANSAS  
Department of Environmental Quality

March 22, 2012

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

RE: Pretreatment Compliance Inspection

RE: AFIN: 18-00879                      NPDES Permit No.: AR0022039

Dear Mr. Rimmer:

On December 7, 2011 and December 9, 2011 fellow inspector Brent Walker and I performed a routine pretreatment compliance inspection of the waste water treatment facility in accordance with the provisions of the Federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, and the regulations promulgated thereunder. This inspection revealed the following violations:

1. The IU site visit to Quala Wash (Previously PSC Container) revealed:
  - a. Lack of familiarity with pretreatment requirements by facility representative.
  - b. Inadequate sample point. The sampling hose was placed horizontally inside a PVC "T".
  - c. Tanker contents were drained onto the ground and bypassed pretreatment equipment.
  - d. The drain valve was open on the secondary containment to the outdoor holding tank.
2. The IU site visit to ATM Oil / Jim's Tank Service revealed the following violations:
  - a. Lack of familiarity with pretreatment requirements by facility representatives.
  - b. This facility routinely discharged leachate into the West Memphis Collection system in violation of the pretreatment permit. Additionally, West Memphis POTW personnel were not aware of the leachate received from this industrial user. .
  - c. Inadequate sampling. Wastewater was hauled from Marion to West Memphis by truck and discharged into a manhole. Samples were usually taken from the bottom of the tanker, and not from the top where oil was present.
3. The Baseline Monitoring Reports (BMR) were not reviewed for compliance with 40 CFR 403.12 (b). The BMR for Quala Wash did not include process flow diagrams, and a certification of compliance.
4. All permitted facilities were not inspected by the POTW. Only Categorical Industrial Users were inspected.

John Rimmer, City of West Memphis WWTP  
March 22, 2012  
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The above items require your immediate attention. Please submit a written response to these findings to 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 **April 4, 2012**.

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 assistance, please contact me at [greenway@adeq.state.ar.us](mailto:greenway@adeq.state.ar.us) or 870-935-7221 ext.-15.

Sincerely,



Michael B. Greenway  
District 3 Field Inspector  
Water Division

cc: Water Division Enforcement Branch  
Water Division Permits Branch



 <p style="text-align: center;">UNITED STATES ENVIRONMENTAL PROTECTION AGENCY Washington, D.C. 20460</p> <h2 style="text-align: center;">NPDES Compliance Inspection Report</h2>	Form Approved OMB No. 2040-0003
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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	1	1	2	0	7	17	18	P	19	S	20	1
Remarks																												
1 8 - 0 0 8 7 9                             C R I T T E N D E N																												
Inspection Work Days				Facility Evaluation Rating				BI		QA		-----Reserved-----																
67         69				70   N				71   N   72   N		73         74		75                             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> ) <b>Pretreatment Program</b> <b>City of West Memphis Waste Water Treatment Plant</b> <b>West Memphis, AR</b> <b>Crittenden Co.</b>	<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:50%;">Entry Time/Date 10:00 / 12-07-2011 09:45 / 12-09-2011</td> <td style="width:50%;">Permit Effective Date <b>August 1, 2008</b></td> </tr> <tr> <td>Exit Time/Date 15:45 / 12-07-2011 16:45 / 12-09-2011</td> <td>Permit Expiration Date <b>July 31, 2013</b></td> </tr> </table>	Entry Time/Date 10:00 / 12-07-2011 09:45 / 12-09-2011	Permit Effective Date <b>August 1, 2008</b>	Exit Time/Date 15:45 / 12-07-2011 16:45 / 12-09-2011	Permit Expiration Date <b>July 31, 2013</b>
Entry Time/Date 10:00 / 12-07-2011 09:45 / 12-09-2011	Permit Effective Date <b>August 1, 2008</b>				
Exit Time/Date 15:45 / 12-07-2011 16:45 / 12-09-2011	Permit Expiration Date <b>July 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</b> <b>Marvin Jones / Lab Supervisor / 870-702-5151</b>	Other Facility Data  <b>35.124145</b> <b>-90.179052</b>  <b>PDS # 064405</b>				
Name, Address of Responsible Official/Title/Phone and Fax Number <b>John Rimmer / General Manager / 870-735-3355</b> <b>City of West Memphis WWTP</b> <b>P.O. Box 1868</b> <b>West Memphis, AR 72303</b>	<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="text-align: center;">Contacted</td> </tr> <tr> <td style="text-align: center;">Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></td> </tr> </table>	Contacted	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>		
Contacted					
Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>					

Section C: Areas Evaluated During Inspection							
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)							
S	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 PCI Report for a Summary of Findings/Comments ***

Name(s) and Signature(s) of Inspector(s) <b>Michael B. Greenway</b> <b>Brent Walker</b>  	Agency/Office/Telephone/Fax <b>AR Dept. of Environmental Quality-Jonesboro</b> <b>(870) 935-7221 ext. 15/(870) 935-4715 (Fax)</b>	Date <b>January 6, 2012</b>
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date

**ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY  
PRETREATMENT COMPLIANCE INSPECTION (PCI) REPORT**

Name of Municipality:	<b>West Memphis, AR</b>
AFIN Number:	<b>18-00879</b>
NPDES Permit Number(s):	<b>AR0022039, AR0022578, AR0022586</b>
Program Tracked under NPDES Permit Number:	<b>AR0022039</b>
Fact Sheet Preparation Date:	<b>Annual Report Only</b>
Date of Last PCI/Audit:	<b>February 02, 2010</b>
Date of Last Annual Report:	<b>April 13, 2011</b>
Name of Inspector:	<b>Brent L. Walker and Michael B. Greenway</b>
Date PCI Performed:	<b>December 7, 2011 and December 9, 2011</b>
Name, Title, and Telephone Number of Facility Representative:	<b>Denise Bosnick / Director of Environmental Quality / 870-702-5141</b>
Name and Title of Other Participants:	<b>Tommie Butler / Field Technician / 870-702-5151 Marvin Jones / Lab Supervisor / 870-702-5151</b>
Number of IUs Visited:	<b>2</b>
Name(s) of IUs Visited:	<b>Quala Wash, and ATM oil (Jim's Tank Service)</b>
AN IU SITE VISIT FORM SHOULD BE COMPLETED FOR EACH IU VISITED	
<b>NOTE: ANY QUESTION PRINTED IN ALL CAPS AND BOLD PRINT INDICATED A REGULATORY REQUIREMENT AND MUST BE ANSWERED FOR THE PCI REPORT TO BE COMPLETE. A NO ANSWER TO ONE OF THESE QUESTIONS SHOULD RESULT IN AN UNSATISFACTORY RATING.</b>	
Form approved July 1989	

<b>A. INDUSTRIAL USER SURVEY</b>		
1.	List any Significant Industrial Users (SIUs) which have been added or deleted from the program since the last audit or inspection.	<b>PSC is now Quala Wash, and Warren Unilube is permitted.</b>
2.	Has ADEQ or EPA been notified of these changes?	<b>No</b>
3.	<b>HAS THE INDUSTRIAL USER SURVEY BEEN KEPT UPDATED?</b>	<b>Yes</b>
4.	What procedures are being used to update the IU Survey?	
	<b>Review of new city permits.</b>	
	<b>Review of new accounts.</b>	
	<b>Code enforcement.</b>	
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)	<b>4</b>
6.	Number of Categorical Industrial Users:	<b>4</b>
7.	How does the POTW determine the appropriate categorical standards to apply to an IU?	
	<b>NAICS and 40 CFR</b>	
8.	List all categorical IUs discharging under the approved program. Include the name of the IU, the regulatory category (such 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:
	<b>Quala Wash</b>	<b>Truck Wash</b>
	<b>Regulated Process:</b>	<b>Int./Ext. Truck Wash</b>
	<b>Grace Trailer</b>	<b>Truck Wash</b>
	<b>Automated Conveyors</b>	<b>Metal Finishing</b>
	<b>Stateside Steel and Wire</b>	<b>Metal Finishing</b>
		<b>Metal Plating</b>
		<b>Metal Plating</b>

B. LOCAL LIMITS

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

No Specific numeric limits for current IU's. Applied when appropriate.

2. Describe any apparent problems with the local limits.

None

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		Comments:
		Permit:	Program:	
Metals:				
Influent:	<u>4/yr</u>	<u>4/yr</u>	<u>None</u>	<u>None</u>
Effluent:	<u>4/yr</u>	<u>4/yr</u>	<u>None</u>	<u>None</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 an estimated 6500 gallons of oil/transmission fluid to the collection system on March 22, 2011. Warren Unilube has since been permitted by the POTW.

<b>C. INDUSTRIAL USER CONTROL MECHANISM</b>		
1.	Is the POTW using the type of control mechanism (permit, agreement, etc.) required by the approved program?	<b>Yes-Permit</b>
2.	How many IU permits (or other control documents) have been issued?	<b>4 SIU and 5 NSIU.</b>
3.	<b>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.</b>	
	<b>Yes</b>	
4.	Does the control document contain the following items?	
	An expiration date:	<b>Yes</b>
	Discharge limitations:	<b>Yes</b>
	If the program requires self-monitoring by the IUs, do the Permits contain:	
	IU self-monitoring requirements:	<b>N/A</b>
	IU reporting requirements:	<b>N/A</b>
5.	Indicate which of the following recommended standard conditions are contained in the control documents:	
	<b>(Reviewed Warren Unilube's Permit)</b>	
	Sample location:	<b>Yes</b>
	Type of sample:	<b>Yes</b>
	Monitoring frequency:	<b>Yes</b>
	Bypass prohibition:	<b>Yes - City ordinance</b>
	Right of entry:	<b>Yes</b>
	Nontransferability:	<b>Yes</b>
	Revocation clause:	<b>Yes</b>
	Penalty Provisions:	<b>Yes</b>
	Slug load notification:	<b>Yes</b>
	Notification of process change:	<b>Yes</b>

<b>D. MONITORING OF IUS BY POTW</b>			
1. Indicate current inspection and sampling frequency and program requirement below:			
	Current frequency:	Program Requirement:	
Sampling:			
categorical IUs	<b>1-2/month</b>		<b>1/yr</b>
other SIUs	<b>1-2/month</b>		<b>1/yr</b>
Inspection:			
categorical IUs	<b>1/yr</b>		<b>1/yr</b>
other SIUs	<b>N/A</b>		<b>1/yr</b>
2. <b>HAS EACH SIU BEEN INSPECTED AND SAMPLED AT THE FREQUENCY REQUIRED BY THE APPROVED PROGRAM? Only Categorical SIU's were inspected. The five permitted NSIU's were not inspected.</b>			
3. Are inspections announced or unannounced?		<b>Both</b>	
4. Are records kept of each inspection?		<b>Yes</b>	
5. Does the inspection report contain an adequate description of the following:			
Date and time of inspection:		<b>Yes</b>	
Officials present:		<b>Yes</b>	
Inspection of chemical storage areas:		<b>Yes</b>	
Description of regulated processes, categorical waste streams, and discharge location of these waste streams:		<b>Yes</b>	
Inspection of the pretreatment facilities:		<b>Yes</b>	
Review of self-monitoring records:		<b>N/A</b>	
Observation of IU self-monitoring procedures:		<b>N/A</b>	
Verification that approved analytical techniques are used:		<b>N/A</b>	
Verification of IU flow measurement (where required):		<b>N/A</b>	
6. Overall adequacy of inspection documentation:		<b>Adequate</b>	



7.	<b>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) .</b>	
	<b>Yes</b>	
8.	Are analyses performed in accordance with EPA-approved methods (40 CFR 136)?	<b>Yes</b>
9.	Are sampling and flow monitoring equipment properly maintained?	<b>Yes</b>
10.	Is the POTW keeping proper field notes and chain of custody forms?	<b>Yes</b>
11.	Is the sampling location representative of the discharge to the collection system?	<b>Yes</b>
12.	Are sampling locations identified in POTW records?	<b>Yes</b>
13.	Are sampling services available in an emergency?	<b>Yes</b>
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? <b>Reports not required; Director of Environmental Quality keeps track of violations and required responses to letters.</b>	
15.	<b>ARE SELF-MONITORING REPORTS REVIEWED TO VERIFY THAT ANALYSES WERE PERFORMED FOR ALL REGULATED PARAMETERS, AND TO EVALUATE COMPLIANCE WITH EFFLUENT LIMITS?</b>	
	<b>N/A</b>	
16.	<b>IF VIOLATIONS ARE FOUND IN REPORTS, DOES THE POTW RESPOND TO ALL VIOLATIONS?</b>	
	<b>N/A</b>	

17.	What are the POTW's procedures for following up violations?
	<b>Letter requiring a response, additional action depends on nature of violation and corrective action taken. NOV for pH violations are issued immediately onsite.</b>
18.	<b>HAS THE POTW REVIEWED BMRS FOR COMPLIANCE WITH 40 CFR 403.12(b)?:</b> <b>No - BMR's were incomplete.</b>
	Review a Baseline Monitoring Report from the POTW's file, and indicate which of the following items can be identified in the BMR:
	Name and address: <b>Yes (Reviewed Quala Services LLC)</b>
	Other environmental permits held: <b>None</b>
	Description of operations: <b>Yes</b>
	Process flow diagrams: <b>No</b>
	Flow measurements: <b>Yes</b>
	Measurements of regulated pollutants: <b>Yes</b>
	Certification of compliance by the IU: <b>No</b>
	Compliance schedule (if needed): <b>N/A</b>
19.	Additional comments on the POTW's inspection and sampling procedures:
	<b>Incomplete BMR for Quala Services LLC, no certification of compliance or flow diagram.</b>

<b>E. Enforcement</b>			
<b>1. HAS THE POTW IMPLEMENTED ENFORCEMENT RESPONSE PROCEDURES TO ADEQUATELY ADDRESS EVERY IU VIOLATION OF PRETREATMENT STANDARDS AND REQUIREMENTS?</b>			
			<b>Yes</b>
<b>2. How does the POTW respond to the following violations?</b>			
Effluent limitations:		<b>Notice of Violation</b>	
Late reports:		<b>Letter - very few reports are required.</b>	
Unpermitted discharges:		<b>Letter, &amp; depends on circumstances.</b>	
Slug loads or spills:		<b>Letter and Notice of Violation.</b>	
<b>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)?</b>			
<b>Yes. - ATM Oil, Grace Trailer, Langston Bag, PSC Container (now Quala Services), and Stateside Steel.</b>			
<b>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.</b>			
Name:	Type of Violation:	Enforcement Action:	Compliance Deadline:
<b>ATM Oil</b>	<b>3 Oil &amp; Grease</b>	<b>NOV</b>	<b>N/A</b>
<b>Grace Trailer</b>	<b>pH, Cu, Hg, O&amp;G, TPH Oil and Grease</b>	<b>NOV</b>	<b>N/A</b>
<b>Langston Bag</b>	<b>Cu, O&amp;G</b>	<b>NOV</b>	<b>N/A</b>
<b>PSC Container (Now Quala)</b>	<b>pH, Cu, Hg, O&amp;G</b>	<b>NOV</b>	<b>N/A</b>
<b>Stateside Steel</b>	<b>pH, Cr, Zn, O&amp;G</b>	<b>NOV</b>	<b>N/A</b>

5.	Comments on the POTW's enforcement procedures:
	<b>Adequate</b>
F. POTW'S PRETREATMENT ORGANIZATION STRUCTURE	
1.	Is the program structure essentially the same as that presented in the approved pretreatment program? <b>Yes</b>
2.	Are staffing levels adequate? <b>Yes</b>
3.	Are the responsible officials familiar with the approved program? <b>Yes</b>
G. MULTIJURISDICTIONAL ISSUES	
1.	List any IUs which are located outside of the jurisdictional area of the POTW: <b>None</b>
2.	Does the POTW have adequate procedures for controlling IUs located outside its jurisdictional area? <b>N/A</b>
3.	Does the POTW have copies of permits for IUs in other cities? <b>N/A</b>
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? <b>N/A</b>
5.	Comments on multijurisdictional issues: <b>None</b>

H. EVALUATION AND COMMENTS

Inadequate monitoring of IU's - All permitted facilities were not inspected by the POTW. Only Categorical Industrial Users were inspected.

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry:	<b>Quala Services LLC (Previously PSC Container)</b>
POTW Name:	<b>City of West Memphis</b>
Industry Contacts:	<b>Marvin Leflore, shift supervisor</b>
Date and Time of Visit:	<b>December 9, 2011. 10:40 AM</b>
Description of Manufacturing Process:	<b>Internal and external truck washing. Washout of tankers used to haul food grade materials, polymers, oils, adhesives, and resins.</b>
Sources of Process Wastewater:	<b>Internal and external truck washing.</b>
Categorical Industry?	<b>Yes</b>
Basis for Limits:	<b>Local sewer ordinance and 40 CFR.</b>
Point of Application:	<b>Prior to city connection.</b>
Description of Pretreatment Equipment and Procedures:	<b>Aeration and settling tank.</b>
Spill Prevention and Solvent Management Procedures:	<b>Indoor chemical storage areas. Inadequate, there was spilled oil and chemicals on the floor. The drain valve was open on the secondary containment for the large outdoor holding tank.</b>
Sampling Location and Equipment:	<b>Sampling point was not adequate. The sampling hose was placed horizontally in the discharge pipe and not completely submerged in the discharge stream.</b>

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry:	<b>ATM Oil (Jim's Tank Service)</b>
POTW Name:	<b>City of West Memphis</b>
Industry Contacts:	<b>Dena West</b>
Date and Time of Visit:	<b>December 09, 2011 13:00 to 14:40</b>
Description of Manufacturing Process:	<b>Tank Cleaning, Spill Cleanup, and wastewater hauling. All wastewater sources are comingled and treated by separation in large tanks.</b>
Sources of Process Wastewater:	<b>Petroleum storage tanks Landfill leachate (Not permitted)</b>
Categorical Industry?	<b>No</b>
Basis for Limits:	<b>City ordinance and pretreatment program.</b>
Point of Application:	<b>Prior to connection to city sewer.</b>
Description of Pretreatment Equipment and Procedures:	<b>Oil and Water separator. Tank farm used to separate petroleum from wastewater. pH adjustment with NaOH and Sulfuric acid.</b>
Spill Prevention and Solvent Management Procedures:	<b>Containment and absorbents.</b>
Sampling Location and Equipment:	<b>Wastewater is hauled by truck and discharged into a manhole near Quala Wash.</b>

PPETS CODE SHEET

PRETREATMENT COMPLIANCE INSPECTION (PCI)

		CODE
INSPECTOR'S NAME:	<b>Michael Greenway, Brent Walker</b>	
NAME OF FACILITY:	<b>West Memphis Wastewater Treatment Facility</b>	
PERMIT NUMBER USED TO TRACK PROGRAM:	<b>AR0022039</b>	NPID
DATE OF PCI:	<b>December 7, 2011 and December 9, 2011</b>	DTIA
PPETS WENDB DATA ELEMENTS		
NUMBER OF SIGNIFICANT IUS (SIUS):	<b>4</b>	SIUS
NUMBER OF CATEGORICAL IUS:	<b>4</b>	CIUS
SIUS NOT SAMPLED OR INSPECTED BY POTW:	<b>0</b>	NOIN
SIUS WITHOUT CONTROL MECHANISM:	<b>0</b>	NOCM
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH STANDARDS OR REPORTING:	<b>3</b>	PSNC
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH SELF-MONITORING REQUIREMENTS:	<b>0</b>	MSNC
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH SELF-MONITORING AND NOT INSPECTED OR SAMPLED BY POTW:	<b>0</b>	SNIN





## WEST MEMPHIS UTILITY COMMISSION

604 East Cooper P O Box 1868

West Memphis, AR 72301

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

April 3, 2012

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

Re: NPDES Compliance Evaluation Inspection Wastewater Treatment Plant  
NPDES Sanitary Sewer Overflow Inspection  
Pretreatment Compliance Inspection

AFIN: 18-00879 NPDES Permit No.: AR0022039 and AR00C405

We recently received a letter addressing a routine compliance inspection performed back in December 2011. The inspection revealed several violations in all areas addressed. This letter is to address those violations:

### Wastewater Treatment Plant:

1. Improper operation and maintenance. This violates Part III, Section B, Item 1.a. of the permit, which requires that 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. The following items were noted:
  - a) There was a small leak from a valve in the effluent wet well. Water from the leak had bypassed the UV treatment system.
  - b) There was sludge on the ground next to a manhole located between the headworks and the sludge drying beds.
  - c) There was a moderate amount of foam observed in the clarifiers and effluent wet well.

### Response:

- a) The valve nuts were tightened and the valve was greased to prevent leaks. (See picture-WWTP-1).
- b) Two pumps have been installed to pump the waste filtrate. These pumps replace the filtrate station that was pumping the filtrate. There should be no more overflows at this manhole. (See picture-WWTP-2 & 3).
- c) There is a 0041 filament in the sludge that I am using c12 in the return sludge to control.

2. Samples taken during the month of May 2011 were not representative of volume and nature of the discharge during that month. It appeared that samples were normally collected on Monday, Tuesday and Wednesday of each week. However on May 2-3, 2011, effluent flow exceeded 20 MGD and the UV treatment system was bypassed. During this week, samples were collected on Thursday, Friday and Saturday (May 5-7, 2011) after effluent flow dropped to less than 8 MGD. This violates Part III, Section C. Item 1. of the permit.

Response:

From this day forward, all samples will be pulled on Monday, Tuesday and Wednesday.

3. Dissolved Oxygen (D.O.) concentration was not accurately reported on the DMR's. D.O. concentration was reported in ug/L instead of mg/L as required by part I, Section A. of the permit.

Response:

All DMRs are corrected. Net DMR is also corrected.

4. The Industrial stormwater (ARR00C405) inspection revealed the following violations:
  - a) Sampling was not performed as required.
  - b) The SWPPP was incomplete. Specifically the generator, equalization basin, and the amount of acreage were not identified in SWPPP.

Response:

- a) We have the permit now and sampling is being performed as required.
- b) All of this has been corrected.

**Sanitary Sewer Overflow:**

1. Station #8 (610 East Jefferson)
  - a) There was an uncovered hole in the floor where a pump had been removed.

Response:

- a) This has been repaired. The holes have been filled (See picture-Pump Station #8 (610 East Jefferson-Inside-1).
2. Station #9 (1620 South Avalon)
    - a) There was excessive grease and solids in the wet well.
    - b) There were uncovered holes in the floor.

Response:

- a) The wet well will be cleaned and will be on a cleaning schedule.
  - b) This hasn't been completed. Two of the areas have been repaired, and one has not. This will be done within the week. (See picture-Pump Station #9 (1620 South Avalon)-Inside 2, 3, & 4).
3. Station #6 (401 South Avalon)
- a) One of the three pumps was not operational.
  - b) There was excessive grease and solids in the wet well.
  - c) One of the pumps did not have a driveshaft guard in place.
  - d) The lights for the lower level were inoperative.

Response:

- a) Two pumps are operational and are all that is needed. The third is not needed and is not operational but was just left in place.
  - b) The wet well has been cleaned and will be on a cleaning schedule. (See picture-Pump Station #6 (410 South Avalon)-Wet Well 1 & 2).
  - c) The one pump that does not have a driveshaft guard is the one that is not needed and is not operational.
  - d) The light in the lower level are now operational. (See picture-Pump Station #6 (410 South Avalon)-Inside 3 & 4).
4. Station #26A (Shady Grove)
- a) There was excessive grease and solids in the wet well.
  - b) The pumps were not alternating; both ran at the same time.

Response:

- a) The wet well has been cleaned and will be on a cleaning schedule. (See picture-Pump Station 26A-Wet Well-1).
  - b) This issue was actually a problem with the floats. It has been corrected.
5. Station #13A (Park Plaza)
- a) A manhole behind station was damaged and partially uncovered.

Response:

- a) This has been repaired. (See picture-Pump Station #13A (Park Plaza)-Outside-1 & 2).
6. Station #29 (Lalman Mobile Home Park)

- a) It appeared this was a significant source of inflow, due to the unprotected sewer connections that were not in use.

Response:

- a) These are private sewer lines. If this issue needs to be addressed further we would appreciate ADEQ submitting a letter addressing the issue.

7. Station #35 (Southland Drive)

- a) There was excessive grease and solids in the wet well.
- b) Lights in the lower level were inoperative.
- c) It appeared that pumps were not properly maintained. One of the drive shafts did not appear to be properly greased and the pump was noisy during operation.
- d) Guards did not adequately cover drive shafts.

Response:

- a) Wet well has been cleaned and will be on a cleaning schedule. (See picture-Pump Station #35 (Southland Drive)-Wet Well-1).
- b) Lights are now operational. (See picture-Pump Station #35 (Southland Drive)-Inside-1).
- c) This has been corrected.
- d) This will be corrected.

8. Station #33 (Bill's Grill)

- a) There was excessive grease and solids in the wet well.
- b) The door to the pumps station was unlocked. Additionally, the door could not be unlocked with a key from the outside.
- c) Guards did not adequately cover drive shafts.

Response:

- a) Wet well has been cleaned and will be on a cleaning schedule. (See picture-Pump Station #33 (Bills Grill)-Wet Well-1).
- b) This has been corrected. (See picture-Pump Station #33 (Bills Grill)-Outside-1).
- c) This will be corrected.

Also included with this letter will be a copy of a Corrective Action Plan. This plan has somewhat been reworked from the last copy received by the inspectors.

**Pretreatment Compliance Inspection:**

1. The IU site visit to Quala Wash (Previously PSC Container) revealed:
  - a) Lack of familiarity with pretreatment requirements by facility representative.

- b) Inadequate sample point. The sampling hose was placed horizontally inside a PVC "T".
- c) Tanker contents were drained onto the ground and bypassed pretreatment equipment.
- d) The drain valve was open on the secondary containment to the outdoor holding tank.

Response:

All of the above will be addressed with Quala Wash in a letter. When the letter is sent I will copy Michael Greenway/Brent Walker.

- 2. The IU site visit to ATM Oil/Jim's Tank Service revealed the following violations:
  - a) Lack of familiarity with pretreatment requirements by facility representatives.
  - b) This facility routinely discharged leachate into the West Memphis collection system in violation of the pretreatment permit. Additionally, West Memphis POTW personnel were not aware of the leachate received from this industrial user.
  - c) Inadequate sampling. Wastewater was hauled from Marion to West Memphis by truck and discharged into a manhole. Samples were usually taken from the bottom of the tanker and not from the top where oil was present.

Response:

- a) At the time of the inspection, everyone familiar with the requirements was working off site.
  - b) This has already been addressed somewhat with the City Attorney and will be addressed further now that we have received the letter addressing the issue.
  - c) This has been changed and all samples are now taken from the top of the tanker.
- 3. The baseline Monitoring Reports (BMR) were not reviewed for compliance with 40 CFR 403.12 (b). The BMR for Quala Wash did not include process flow diagrams, and a certification of compliance.

Response:

This will be addressed in a letter along with the other issues addressed. A copy of the letter will be sent to Michael Greenway/Brent Walker.

- 4. All permitted facilities were not inspected by the POTW. Only Categorical Industrial Users were inspected.

Response:

All Industrial User will be inspected this year.

If you needed additional information you may contact Denise Bosnick, Director Environmental Quality at 870-702-5141.

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

Sincerely,

A handwritten signature in cursive script that reads "John Rimmer". The signature is written in black ink and is positioned above the printed name and title.

John Rimmer  
General Manager

## **Corrective Action Plan**

The 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 defects located during the SSES. All of the Priority 1 defects and most of the Priority 2 defects will be rehabilitated in 2013. 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
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. Therefore, 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**

West Memphis Utility Commission will be hiring an Engineering Consultant and RJN inc. to inspect a basin every year for the next 5 years. With there recommendations, make repairs where they are needed. 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 inspections of all 42 stations, repairs have been completed.

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.

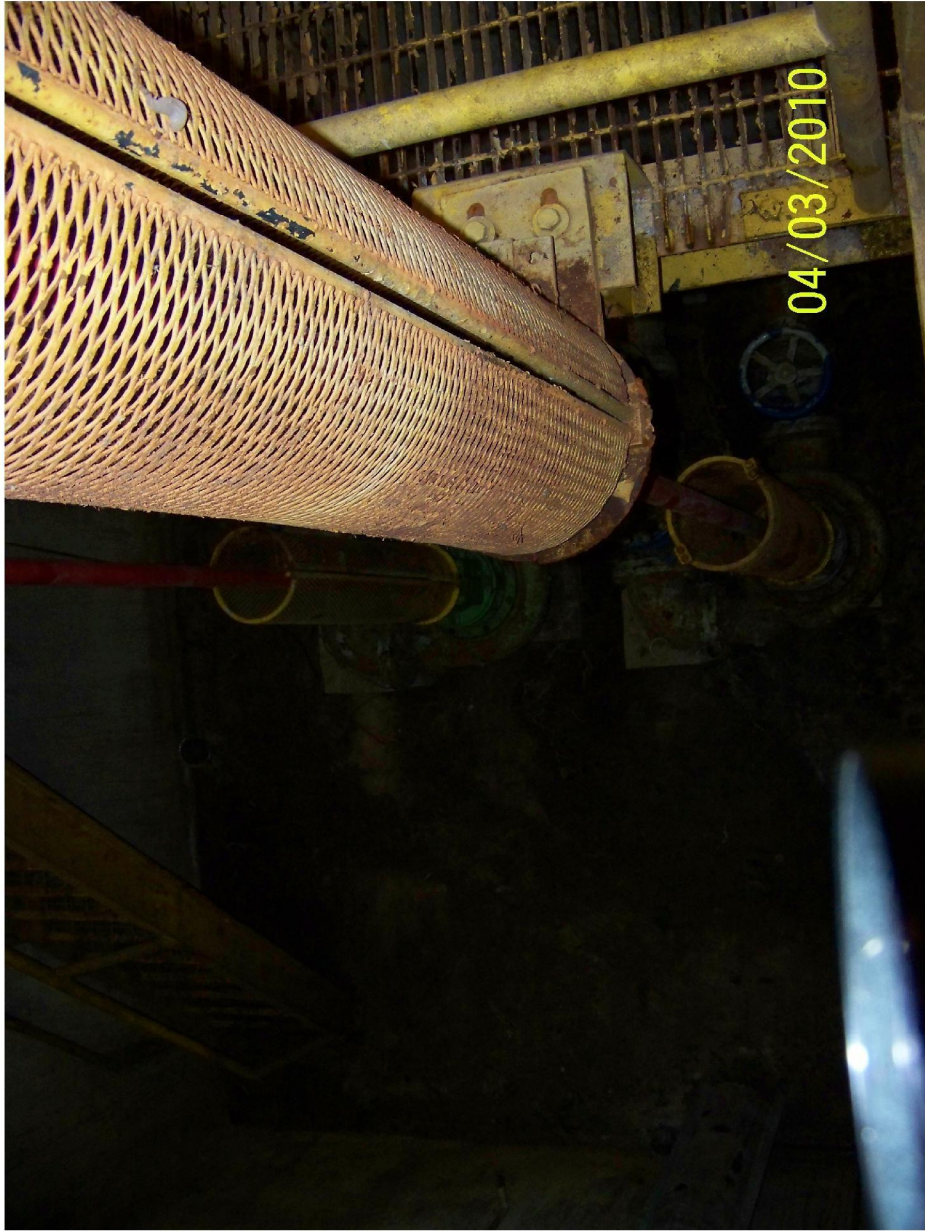






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Next business afternoon. <sup>†</sup> Saturday Delivery NOT available.

FedEx First Overnight.  
Earliest next business morning delivery to select locations.

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Second business day. <sup>†</sup> Thursday shipments will be delivered on Monday unless SATURDAY Delivery is selected.

FedEx Express Saver  
Third business day. <sup>†</sup> Saturday Delivery NOT available.

4b Express Freight Service

\*\* To most locations.

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Next business day. <sup>††</sup> Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.

FedEx 1 Day Freight Booking No.

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Second business day. <sup>††</sup> Thursday shipments will be delivered on Monday unless SATURDAY Delivery is selected. <sup>†††</sup>

FedEx 3 Day Freight  
Third business day. <sup>††</sup> Saturday Delivery NOT available.

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