



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  
Page 2

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



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	N	2	5	3	A	R	0	0	2	2	0	3	9	11	12	1	1	1	2	0	9	17	18	I	19	S	20	2
Remarks																												
0 0 2 C																												
Inspection Work Days						Facility Evaluation Rating						BI		QA		-----Reserved-----												
67						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>ATM Oil / Jim's Tank Service</b> <b>IU of West Memphis – AR0022039</b> <b>435 Dacus Rd.</b> <b>West Memphis, AR</b> <b>Crittenden Co.</b>		Entry Time/Date <b>13:00 / December 09, 2011</b>		Permit Effective Date <b>August 1, 2008</b>	
		Exit Time/Date <b>14:40 / December 09, 2011</b>		Permit Expiration Date <b>July 31, 2013</b>	
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) <b>Dena West /Controller-Reg. Agent / 870-357-7237</b>				Other Facility Data <b>35.190591</b> <b>-90.126310</b>  <b>PDS # 064406</b>	
Name, Address of Responsible Official/Title/Phone and Fax Number <b>Lance Berryhill / Chief Manager / 901-357-7237</b> <b>ATM Oil / Jim's Tank Service</b> <b>435 Dacus Rd.</b> <b>Marion, AR 72364</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)

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

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

\*\*\*See the attached IU Site Visit form and the PCI Inspection Report from this date for additional information\*\*\*

Name(s) and Signature(s) of Inspector(s) <b>Michael Greenway</b> <b>Brent L. 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 25, 2011</b>
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date

**Industrial User Site Visit**

Name of Industry: ATM Oil / Jim's Tank Service

Industry Contacts: Dena West, Controller( ATM Oil) / Reg. Agent (Jim's Tank Service)

Type of Industry: Environmental Services (Spill cleanup, tank cleaning, leachate disposal)

Date of Visit: December 09, 2011

- |   |                       |                      |                       |
|---|-----------------------|----------------------|-----------------------|
| 1. Significant industrial user?                       | <u>          </u> Yes | <u>  X  </u> No      | <u>          </u> N/A |
| 2. Pretreatment equipment or procedures?              | <u>  X  </u> Yes      | <u>          </u> No | <u>          </u> N/A |
| 3. Pretreatment equipment maintained and operational? | <u>  X  </u> Yes      | <u>          </u> No | <u>          </u> N/A |
| 4. Hazardous waste generated or stored?               | <u>  X  </u> Yes      | <u>          </u> No | <u>          </u> N/A |
| 5. Proper solid waste disposal?                       | <u>  X  </u> Yes      | <u>          </u> No | <u>          </u> N/A |
| 6. Solvent management/TTO control?                    | <u>          </u> Yes | <u>          </u> No | <u>  X  </u> N/A      |
| 7. Suitable sampling location?                        | <u>          </u> Yes | <u>  X  </u> No      | <u>          </u> N/A |
| 8. Appropriate self-monitoring procedures/equipment?  | <u>          </u> Yes | <u>          </u> No | <u>  X  </u> N/A      |
| 9. Adequate spill prevention?                         | <u>          </u> Yes | <u>  X  </u> No      | <u>          </u> N/A |
| 10. Industry familiar with limits and requirements?   | <u>          </u> Yes | <u>  X  </u> No      | <u>          </u> N/A |

**Additional Comments:**

Facility representatives did not appear familiar with the pretreatment program / permit.  
This facility discharged wastewater mixed with leachate into the West Memphis wastewater collection system.  
The wastewater is 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.

Visit Conducted by: Brent L. Walker *Brent L Walker* & Michael B. Greenway Date: 12-09-2011



## 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 dark 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. There fore, the second phase SSES will consist primarily of field tasks to locate defects and prepare rehab recommendations within the area of the collection system that were not investigated in Phase I.

Another aspect to be undertaken in the Phase II SSES will be monitoring the results of the Phase I rehabilitation program and the effects on I/I reduction. These results will be used for future rehab programs to determine the most effective methods for achieving I/I reduction.
3. Based upon the results of the Phase II SSES, the Phase II rehabilitation program will be developed. All priority 1 defects found will be correct and based upon the effectiveness of priority 2 rehab in Phase I, a determination made Priority 2 repairs. Phase II rehab will be spread over a 2 year period as the area covered in the study is twice the size of the initial program.
4. The final step in the Corrective Action Plan is the development and implementation of a Comprehensive Maintenance Management Program (CMMP). The CMMP will be designed as a program to manage the maintenance and capital improvements of the system for the purpose of the efficient overall operation of the system to maintain regulatory compliance and eliminate customer service problems. The basis of the program is to provide a well organized approach in a proactive manner in identifying and correcting maintenance problems before they become customer service complaints or regulatory violations.

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

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

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

## **Conclusion**

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.

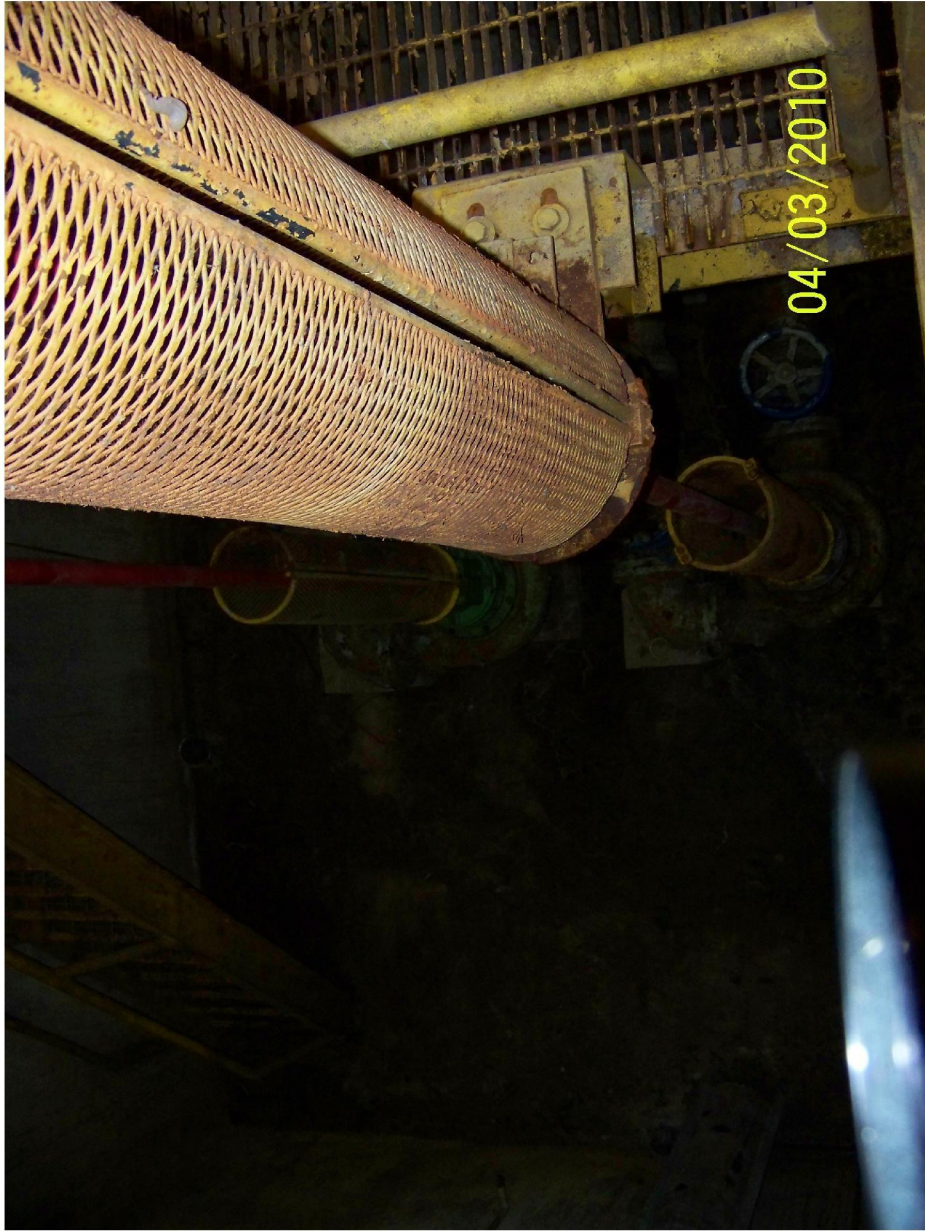
These projects and this Plan are strong evidence of the commitment by the City of West Memphis to address the sewer infrastructure in an aggressive and proactive manner. The elements of this plan will allow the City to achieve the stated goals and objectives of regulatory compliance and I/I reduction.





04/04/2010















04/03/2010



04/03/2010































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Dept./Floor/Substation

City WEST MEMPHIS

State AR ZIP 72301-3249

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Company Water Enforcement Division

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4a Express Package Service

\* To most locations.

Packages up to 150 lbs.

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

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

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

FedEx 2Day  
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.

Packages over 150 lbs.

FedEx 1 Day Freight  
Next business day. <sup>†</sup> Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.

FedEx 1 Day Freight Booking No.

FedEx 2 Day Freight  
Second business day. <sup>†</sup> Thursday shipments will be delivered on Monday unless SATURDAY Delivery is selected.

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

5 Packaging <sup>†</sup> Declared value limit \$200.

FedEx Envelope\*

FedEx Pak  
Includes FedEx Small Pak and  
FedEx Large Pak.

FedEx Box

FedEx Tube

Other

6 Special Handling and Delivery Signature Options

SATURDAY Delivery  
NOT available for FedEx Standard Overnight, FedEx Express Saver, or FedEx 2Day Freight.

No Signature Required  
Package may be left without obtaining a signature for delivery.

Direct Signature  
Someone at recipient's address may sign for delivery. Fee applies.

Indirect Signature  
If no one is available at recipient's address, someone at a neighboring address may sign for delivery. For residential deliveries only. Fee applies.

Does this shipment contain dangerous goods?

One box must be checked.

No  Yes  
As per attached Shipper's Declaration.

Yes  
Shipper's Declaration not required.

Dry Ice  
Dry Ice & UN 1845

Dangerous goods (including dry ice) cannot be shipped in FedEx packaging or placed in FedEx Express Drop Box.

Cargo Aircraft Only

7 Payment Bill to:

Enter FedEx Acct. No. or Credit Card No. below.

Obtain recip. Acct. No.

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Recipient

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Credit Card

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Total Packages

Total Weight

Credit Card Acct.

<sup>†</sup>The Rate by is limited to \$100 unless you declare a higher value. See the current FedEx Services Guide for details.

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