



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 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																													
Inspection Work Days						Facility Evaluation Rating						BI		QA		-----Reserved-----													
67					69	70	N																						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>) Quala Wash IU of West Memphis – AR0022039 400 Mound City Rd. West Memphis, AR Crittenden Co.		Entry Time/Date 10:40 / 12-09-2011		Permit Effective Date August 1, 2008	
		Exit Time/Date 11:55 / 12-09-2011		Permit Expiration Date July 31, 2013	
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Marvin Leflore / Shift Supervisor / 901-314-7672				Other Facility Data	
Name, Address of Responsible Official/Title/Phone and Fax Number Lamar Promise / Manager / 870-732-2255 Quala Wash 400 Mound City Rd. West Memphis, AR 72301				Contacted	
				Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
				PDS # 064407	

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) Michael B. Greenway Brent L. Walker		Agency/Office/Telephone/Fax AR Dept. of Environmental Quality-Jonesboro (870) 935-7221 ext. 15/(870) 935-4715 (Fax)	Date December 09, 2011
Signature of Reviewer		Agency/Office/Phone and Fax Numbers	Date

Industrial User Site Visit

Name of Industry: Quala Wash

Industry Contacts: Marvin Leflore, Shift Supervisor

Type of Industry: Internal and external truck wash.

Date of Visit: December 09, 2011

- | | | | | | | |
|---|------------|-----|------------|----|------------|-----|
| 1. Significant industrial user? | <u> X </u> | Yes | <u> </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 representative did not appear familiar with the pretreatment program.

The drain valve to the secondary containment was left open on the large outside tank.

Sampling location was inadequate. The sampling hose was placed horizontally and not submerged in the discharge pipe.

Pretreatment equipment was bypassed. Tanker contents were drained onto the ground outside the wash bay.

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 ARR00C405

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,

John Rimmer
General Manager