



STATE OF ARKANSAS
DEPARTMENT OF POLLUTION CONTROL AND ECOLOGY

8001 NATIONAL DRIVE, P.O. BOX 8913
LITTLE ROCK, ARKANSAS 72219-8913
PHONE: (501) 562-7444
FAX: (501) 562-4632



May 24, 1993

RECEIVED
MAY 25 1993
8844
RECEIVED

Mr. William Johnson
General Manager of Water Utilities
City of West Memphis
Post Office Box 1868
West Memphis, AR 72301

Re: CSN: 18-0109; NPDES Permit No. AR0022039

Dear Mr. Johnson:

On May 18, 1993, I performed a routine compliance inspection of your facility pursuant to 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. Primary flow monitoring device, a rectangular weir, is not operable.
2. Facility is using influent flow measurement to figure loading rates.
3. Commercial lab the facility uses is not certified by the State of Arkansas.

The aforementioned items require your immediate attention. Please submit a written response to these findings to the NPDES Branch of this Department when these violations have been corrected, but no later than June 23, 1993.

If you have any questions, please contact me at 673-8846.

Sincerely,

Frank Esyfor

Stephen Browning
District Field Inspector
Water Division

SB/sy

cc: NPDES Branch

NPDES COMPLIANCE FILES
NPDES # 22039 *Esyfor*
___ DMR'S *Coled - not delegated*
___ NCR
 CORRESPONDENCE
___ CRAS



NPDES Compliance Inspection Report

Form Approved
OMB No. 2040-0003
Approval Expires 7-31-85

Section A: National Data System Coding

Transaction Code 1N 25	NPDES 3AR101022031911	yr/mo/day 12 9 3 0 5 1 8 17	Inspection Type 18C	Inspector 195	Fac Type 2d1
Remarks CISW 118-10109					
Reserved 67	Facility Evaluation Rating 7d3	BI 71N	OA 72N	Reserved 73	74 75 80

Section B: Facility Data

Name and Location of Facility Inspected City of West Memphis	Entry Time <input checked="" type="checkbox"/> AM <input type="checkbox"/> PM 9:00	Permit Effective Date Sept 1, 1990
	Exit Time/Date 2:30 pm 5-18-93	Permit Expiration Date Aug 31, 1995
Name(s) of On-Site Representative(s) Greg Smith	Title(s) Project Manager / Operator	Phone No(s) 735-9862
Name, Address of Responsible Official William Johnson P.O. Box 1868 West Memphis, AR 72301	Title General Manager of Water Utilities	Contacted <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
	Phone No. 735-3355	

Section C: Areas Evaluated During Inspection

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

S	Permit	M	Flow Measurement	N	Pretreatment	S	Operations & Maintenance
S	Records/Reports	S	Laboratory	S	Compliance Schedules	S	Sludge Disposal
S	Facility Site Review	M	Effluent/Receiving Waters	S	Self-Monitoring Program		Other:

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

Rectangular weir which was installed as primary flow measurement device is inoperable. Facility is using a Marsh-McBirney Model 280 Flow measuring device as primary effluent flow meter. Facility is using influent measurement to figure loading rates. Commercial Lab that facility uses is not certified in the state of ARKANSAS. Facility released of Bio-monitoring in letter dated October 28, 1991 by Nathaniel P. Nehus.

Name(s) and Signature(s) of Inspector(s) Stephen Browning	Agency/Office/Telephone ADPCDE Stuttgart, AR	Date 5-20-93
Signature of Reviewer Stephen Browning	Agency/Office 501-673-8846	Date
Regulatory Office Use Only		
Action Taken		Compliance Status <input type="checkbox"/> Noncompliance <input type="checkbox"/> Compliance

Sections F thru L: Complete on all inspections, as appropriate. N/A = Not Applicable

PERMIT NO.
AR0022039

SECTION F - Facility and Permit Background

ADDRESS OF PERMITTEE IF DIFFERENT FROM FACILITY
(Including City, County and ZIP code)

DATE OF LAST PREVIOUS INVESTIGATION BY EPA/STATE

3-19-92

STATE

FINDINGS

Unsatisfactory Flow measurement on Effluent.

SECTION G - Records and Reports

RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT. YES NO N/A (Further explanation attached **NO**)

DETAILS:

(a) ADEQUATE RECORDS MAINTAINED OF:

- (i) SAMPLING DATE, TIME, EXACT LOCATION YES NO N/A
- (ii) ANALYSES DATES, TIMES YES NO N/A
- (iii) INDIVIDUAL PERFORMING ANALYSIS YES NO N/A
- (iv) ANALYTICAL METHODS/TECHNIQUES USED YES NO N/A
- (v) ANALYTICAL RESULTS (e.g., consistent with self-monitoring report data) YES NO N/A

(b) MONITORING RECORDS (e.g., flow, pH, D.O., etc.) MAINTAINED FOR A MINIMUM OF THREE YEARS INCLUDING ALL ORIGINAL STRIP CHART RECORDINGS (e.g. continuous monitoring instrumentation, calibration and maintenance records). YES NO N/A

(c) LAB EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS KEPT. YES NO N/A

(d) FACILITY OPERATING RECORDS KEPT INCLUDING OPERATING LOGS FOR EACH TREATMENT UNIT. YES NO N/A

(e) QUALITY ASSURANCE RECORDS KEPT. YES NO N/A

(f) RECORDS MAINTAINED OF MAJOR CONTRIBUTING INDUSTRIES (and their compliance status) USING PUBLICLY OWNED TREATMENT WORKS. YES NO N/A

SECTION H - Permit Verification

INSPECTION OBSERVATIONS VERIFY THE PERMIT. YES NO N/A (Further explanation attached **NO**)

DETAILS:

(a) CORRECT NAME AND MAILING ADDRESS OF PERMITTEE. YES NO N/A

(b) FACILITY IS AS DESCRIBED IN PERMIT. YES NO N/A

(c) PRINCIPAL PRODUCT(S) AND PRODUCTION RATES CONFORM WITH THOSE SET FORTH IN PERMIT APPLICATION. YES NO N/A

(d) TREATMENT PROCESSES ARE AS DESCRIBED IN PERMIT APPLICATION. YES NO N/A

(e) NOTIFICATION GIVEN TO EPA/STATE OF NEW, DIFFERENT OR INCREASED DISCHARGES. YES NO N/A

(f) ACCURATE RECORDS OF RAW WATER VOLUME MAINTAINED. YES NO N/A

(g) NUMBER AND LOCATION OF DISCHARGE POINTS ARE AS DESCRIBED IN PERMIT. YES NO N/A

(h) CORRECT NAME AND LOCATION OF RECEIVING WATERS. YES NO N/A

(i) ALL DISCHARGES ARE PERMITTED. YES NO N/A

SECTION I - Operation and Maintenance

TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED. YES NO N/A (Further explanation attached _____)

DETAILS:

(a) STANDBY POWER OR OTHER EQUIVALENT PROVISIONS PROVIDED. YES NO N/A

(b) ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE. YES NO N/A

(c) REPORTS ON ALTERNATE SOURCE OF POWER SENT TO EPA/STATE AS REQUIRED BY PERMIT. YES NO N/A

(d) SLUDGES AND SOLIDS ADEQUATELY DISPOSED. YES NO N/A

(e) ALL TREATMENT UNITS IN SERVICE. YES NO N/A

(f) CONSULTING ENGINEER RETAINED OR AVAILABLE FOR CONSULTATION ON OPERATION AND MAINTENANCE PROBLEMS. YES NO N/A

(g) QUALIFIED OPERATING STAFF PROVIDED. YES NO N/A

(h) ESTABLISHED PROCEDURES AVAILABLE FOR TRAINING NEW OPERATORS. YES NO N/A

(i) FILES MAINTAINED ON SPARE PARTS INVENTORY, MAJOR EQUIPMENT SPECIFICATIONS, AND PARTS AND EQUIPMENT SUPPLIERS. YES NO N/A

(j) INSTRUCTIONS FILES KEPT FOR OPERATION AND MAINTENANCE OF EACH ITEM OF MAJOR EQUIPMENT. YES NO N/A

(k) OPERATION AND MAINTENANCE MANUAL MAINTAINED. YES NO N/A

(l) SPCC PLAN AVAILABLE. YES NO N/A

(m) REGULATORY AGENCY NOTIFIED OF BY PASSING. (Dates _____) YES NO N/A

(n) ANY BY-PASSING SINCE LAST INSPECTION. YES NO N/A

(o) ANY HYDRAULIC AND/OR ORGANIC OVERLOADS EXPERIENCED. YES NO N/A

PERMIT NO.

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SECTION J - Compliance Schedules

PERMITTEE IS MEETING COMPLIANCE SCHEDULE. YES NO N/A (Further explanation attached NO)

CHECK APPROPRIATE PHASE(S):

- (a) THE PERMITTEE HAS OBTAINED THE NECESSARY APPROVALS FROM THE APPROPRIATE AUTHORITIES TO BEGIN CONSTRUCTION.
- (b) PROPER ARRANGEMENT HAS BEEN MADE FOR FINANCING (mortgage commitments, grants, etc.).
- (c) CONTRACTS FOR ENGINEERING SERVICES HAVE BEEN EXECUTED.
- (d) DESIGN PLANS AND SPECIFICATIONS HAVE BEEN COMPLETED.
- (e) CONSTRUCTION HAS COMMENCED.
- (f) CONSTRUCTION AND/OR EQUIPMENT ACQUISITION IS ON SCHEDULE.
- (g) CONSTRUCTION HAS BEEN COMPLETED.
- (h) START-UP HAS COMMENCED.
- (i) THE PERMITTEE HAS REQUESTED AN EXTENSION OF TIME.

SECTION K - Self-Monitoring Program

Part 1 - Flow measurement (Further explanation attached YES)

PERMITTEE FLOW MEASUREMENT MEETS THE REQUIREMENTS AND INTENT OF THE PERMIT. YES NO N/A
DETAILS:

- (a) PRIMARY MEASURING DEVICE PROPERLY INSTALLED. YES NO N/A
TYPE OF DEVICE: WEIR PARSHALL FLUME MAGMETER VENTURI METER OTHER (Specify _____)
- (b) CALIBRATION FREQUENCY ADEQUATE. (Date of last calibration _____) YES NO N/A
- (c) PRIMARY FLOW MEASURING DEVICE PROPERLY OPERATED AND MAINTAINED. YES NO N/A
- (d) SECONDARY INSTRUMENTS (totalizers, recorders, etc.) PROPERLY OPERATED AND MAINTAINED. YES NO N/A
- (e) FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGES OF FLOW RATES. YES NO N/A

Part 2 - Sampling (Further explanation attached NO)

PERMITTEE SAMPLING MEETS THE REQUIREMENTS AND INTENT OF THE PERMIT. YES NO N/A
DETAILS:

- (a) LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES. YES NO N/A
- (b) PARAMETERS AND SAMPLING FREQUENCY AGREE WITH PERMIT. YES NO N/A
- (c) PERMITTEE IS USING METHOD OF SAMPLE COLLECTION REQUIRED BY PERMIT.
IF NO, GRAB MANUAL COMPOSITE AUTOMATIC COMPOSITE FREQUENCY YES NO N/A
- (d) SAMPLE COLLECTION PROCEDURES ARE ADEQUATE. YES NO N/A
 - (i) SAMPLES REFRIGERATED DURING COMPOSITING YES NO N/A
 - (ii) PROPER PRESERVATION TECHNIQUES USED YES NO N/A
 - (iii) FLOW PROPORTIONED SAMPLES OBTAINED WHERE REQUIRED BY PERMIT YES NO N/A
 - (iv) SAMPLE HOLDING TIMES PRIOR TO ANALYSES IN CONFORMANCE WITH 40 CFR 136.3 YES NO N/A
- (e) MONITORING AND ANALYSES BEING PERFORMED MORE FREQUENTLY THAN REQUIRED BY PERMIT. YES NO N/A
- (f) IF (e) IS YES, RESULTS ARE REPORTED IN PERMITTEE'S SELF-MONITORING REPORT. YES NO N/A

Part 3 - Laboratory (Further explanation attached YES)

PERMITTEE LABORATORY PROCEDURES MEET THE REQUIREMENTS AND INTENT OF THE PERMIT. YES NO N/A
DETAILS:

- (a) EPA APPROVED ANALYTICAL TESTING PROCEDURES USED. (40 CFR 136.3) YES NO N/A
- (b) IF ALTERNATE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED. YES NO N/A
- (c) PARAMETERS OTHER THAN THOSE REQUIRED BY THE PERMIT ARE ANALYZED. YES NO N/A
- (d) SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT. YES NO N/A
- (e) QUALITY CONTROL PROCEDURES USED. YES NO N/A
- (f) DUPLICATE SAMPLES ARE ANALYZED. >10 % OF TIME. YES NO N/A
- (g) SPIKED SAMPLES ARE USED. >10 % OF TIME. YES NO N/A
- (h) COMMERCIAL LABORATORY USED. YES NO N/A
- (i) COMMERCIAL LABORATORY STATE CERTIFIED. YES NO N/A

LAB NAME ATL Laboratories

LAB ADDRESS 411 North Third St. Memphis TN 38105

PERMIT NO.

AR0022039

SECTION L - Effluent/Receiving Water Observations (Further explanation attached NO)

OUTFALL NO.	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	VISIBLE FLOAT SOL	COLOR	OTHER
001	—	—	—	—	TRACE	Clear	—

(Sections M and N: Complete as appropriate for sampling inspections)

SECTION M - Sampling Inspection Procedures and Observations (Further explanation attached NO)

- GRAB SAMPLES OBTAINED
- COMPOSITE OBTAINED
- FLOW PROPORTIONED SAMPLE
- AUTOMATIC SAMPLER USED
- SAMPLE SPLIT WITH PERMITTEE
- CHAIN OF CUSTODY EMPLOYED
- SAMPLE OBTAINED FROM FACILITY SAMPLING DEVICE

COMPOSITING FREQUENCY _____ PRESERVATION _____

SAMPLE REFRIGERATED DURING COMPOSITING: YES NO

SAMPLE REPRESENTATIVE OF VOLUME AND NATURE OF DISCHARGE _____

SECTION N - Analytical Results (Attach report if necessary)

(This section is currently blank for analytical results.)

DMR Calculation Check

Reporting Period: From 93 02 01 To 93 02 28
 year month day year month day

Parameter Checked: TSS mg/l 3/wk 6hr Comp.

	<u>Quantity</u>		
	<u>Min.</u>	<u>Avg.</u>	<u>Max.</u>
Reported Value:		5.8	6.9
Calculated Value:		5.8	6.9
Permit Value:		30	45

If calculated value does not equal reported value, explain: