



STATE OF ARKANSAS  
 DEPARTMENT OF POLLUTION CONTROL AND ECOLOGY  
 8001 NATIONAL DRIVE, P.O. BOX 8913  
 LITTLE ROCK, ARKANSAS 72219-8913  
 PHONE: (501) 682-0656  
 FAX: (501) 682-0707



December 4, 1995

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

Re: CSN:18-0019 NPDES Permit No. AR0022039

Dear Mr. Morgan:

On November 15 and 16, 1995, Sam Clardy and I performed a routine compliance evaluation inspection along with a pretreatment compliance inspection of the wastewater treatment facility for the City of West Memphis pursuant to the federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, and the regulations promulgated thereunder. The inspections revealed the following violations:

Compliance Evaluation Inspection

1. Effluent composite samples are not composited according to flow as required by the NPDES permit.
2. No records are being kept on the amount of grit and bar screen waste that is being disposed.
3. Oxidation ditch # 1 was out of service and repairs were being made to the unit.
4. The effluent composite sampler unit was not being maintained at the proper temperature for sampling.
5. Belt press sludge was being stored outside in uncovered roll off units and at the time of the inspection it was raining. The sludge should be covered to keep it dry and to help control vectors.
6. Effluent flow meter had been calibrated however no monthly checks are being performed on the unit to insure the unit is being operated within a +/- 10% error of true value at all times.
7. Effluent samples are being collected at the influent point to the old contact chamber. The NPDES permit requires samples be collected at the discharge of the final treatment unit.

RECEIVED  
 DEC 11 1995  
 2138

NPDES COMPLIANCE FILES  
 NPDES # 22039  
 DMR'S coded  
 NCR  
 X CORRESPONDENCE

in Pretreatment  
 11/10

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8. Evidence of a hydraulic overload was noted at times to the system due to I & I problems in the collection system. It was also noted that the POTW had not been reporting manhole overflows to ADPC&E.
9. Analytical balance was being checked for calibration using P class weights and according to EPA, class S weights should only be used for calibration checks.
10. No records are being kept on the time of calibration of dissolved oxygen and pH meter.
11. No maintenance records are being kept on the dissolved oxygen and pH monitoring equipment.
12. Laboratory thermometers are not being calibrated. Records need to be kept on the date, time and calibration reading of each thermometer.
13. In reviewing laboratory data sheets, a large number of bad dilution water blanks used in the BOD analyses were noted. In the total suspended solids analyses, a constant weight is not being obtained on the prepared filter before filtration of the sample.
14. OMI, who performs the effluent analyses on BOD, TSS and pH for the POTW is not state certified as required by State Law.
15. The influent and effluent table II and table III samples are 24 hour composite samples but are not combined proportional to flow as required by the NPDES permit.

#### Pretreatment Compliance Inspection

1. Not every SIU was inspected last year. The last time, two of the SIU's were inspected was in the spring of 1993.
2. Records are not being maintained on the cleaning and maintenance of composite samplers used in collecting IU's samples. It was also noted that at the time of the inspection, the desiccant cartridges in all of the samplers were in need of being changed.
3. Calibration records for the pH and dissolved oxygen monitoring equipment used to do IU's monitoring is not complete and additional information should be kept.
4. The POTW laboratory is not maintaining records on the analytical testing procedures being used to perform analyses.

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5. The laboratory QA and QC procedures were not complete and need to be improved along with additional QA and QC records kept.
6. The consulting laboratory which does some of the analyses on the IU's samples were not including the results of duplicate and spiked samples. The consulting laboratory also should be supplying the POTW with the frequency which these duplicate and spiked samples are analyzed and this data should be in the IU file.

The aforementioned violations require your immediate attention. Please submit a written response to these findings including the course of action taken to correct each item to the NPDES Enforcement Section of this Department when the violations have been corrected but no later than January 5, 1996.

I would like to express my appreciation to your staff for their cooperation and assistance given to us during the inspection. If you have any questions concerning this inspection, please feel free to contact me at 625-7477.

Sincerely,

*Dale Washam*

Dale Washam  
Inspector Supervisor  
Water Division

DDW:ddw

cc: NPDES Branch  
Sam Clardy



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

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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
Same	December 21, 1994
	FINDINGS
	Satisfactory

**SECTION G - Records and Reports**

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

DETAILS:

(a) ADEQUATE RECORDS MAINTAINED OF:

(i) SAMPLING DATE, TIME, EXACT LOCATION	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A
(ii) ANALYSES DATES, TIMES	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A
(iii) INDIVIDUAL PERFORMING ANALYSIS	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A
(iv) ANALYTICAL METHODS/TECHNIQUES USED	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A
(v) ANALYTICAL RESULTS (e.g., consistent with self-monitoring report data)	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> 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. application not reviewed  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 yes)

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. Crittenden Co. Landfill  YES  NO  N/A

(e) ALL TREATMENT UNITS IN SERVICE. Oxidation ditch #1 out of 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. 2 -> Class III 1 -> Class II 2 -> in training  YES  NO  N/A

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

(i) FILES MAINTAINED ON SPARE PARTS INVENTORY, MAJOR EQUIPMENT SPECIFICATIONS, AND PARTS AND EQUIPMENT SUPPLIERS. (very few spare parts kept)  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. manholes overflowing in rain events  YES  NO  N/A

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

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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 no)

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 Feb. 1993)  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 yes)

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.  YES  NO  N/A  
IF NO,  GRAB  MANUAL COMPOSITE  AUTOMATIC COMPOSITE FREQUENCY three/week
- (d) SAMPLE COLLECTION PROCEDURES ARE ADEQUATE.  YES  NO  N/A
  - (i) SAMPLES REFRIGERATED DURING COMPOSITING at 5.5°C  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. 10-100 % OF TIME.  YES  NO  N/A
- (g) SPIKED SAMPLES ARE USED. \_\_\_\_\_ % OF TIME.  YES  NO  N/A
- (h) COMMERCIAL LABORATORY USED.  YES  NO  N/A
- (i) COMMERCIAL LABORATORY STATE CERTIFIED.  YES  NO  N/A

BOD, TSS + Ph  
LAB NAME OMI  
LAB ADDRESS West Memphis

Table II + Table III  
Environmental Testing Consulting  
2924 Walnut Grove Road  
Memphis TN 3811  
901-327-2750

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

OUTFALL NO.	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	VISIBLE FLOAT SOL	COLOR	OTHER
001	none	none	slight	none	none	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

N/A

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)

N/A





Flow Calculation Sheet

Field Data: Date \_\_\_\_\_ Time \_\_\_\_\_ hrs.  
Head \_\_\_\_\_ Inches  
Type & Size of Flow Monitoring Device \_\_\_\_\_  
Name & Model of Flow Monitoring Device \_\_\_\_\_  
Recorded Flow at date & time listed above \_\_\_\_\_

Reference for Flow Calculations \_\_\_\_\_  
\_\_\_\_\_

Formula:

Calculations:

A Flow calibration check  
could not be performed due  
to the location of effluent  
weir.

$$\% \text{ error} = \frac{\text{recorded value} - \text{calculated value}}{\text{calculated value}} (100)$$

% error =

% error =

NPDES Compliance Inspection Report  
Further Explanations

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Section G Part \_\_\_\_\_

Detail C

No maintenance records are being kept on pH and DO monitoring equipment.

No records kept on DO & pH time of calibration. Thermometers are not being calibrated.

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Section G Part \_\_\_\_\_

Detail e

Effluent flow meter has been calibrated, however no monthly checks are being performed on the unit to insure the unit is being operated within a  $\pm 10\%$  error of true value at all times.

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Section I Part \_\_\_\_\_

Detail e

Oxidation ditch #1 was out of service and repairs were being made.

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Further Explanations

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Section I Part \_\_\_\_\_

Detail m & n

The facility is not noting or reporting manhole overflows to the Department when they occur.

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Section I Part \_\_\_\_\_

Detail o

Evidence of hydraulic overload at times to the system due to I & I problems in the collection system.

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Section k Part 2

Detail a

Sample location is not at the end of the final treatment unit.

NPDES Compliance Inspection Report  
Further Explanations

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Section K Part 2

Detail d (iii)

Influent and Effluent table II and table III sampling are collected by 24 hr composite sample but are not combined proportional to flow.

~~Effluent~~ sampling on BOD and TSS are being collected by 6 hr composite but are not composited according to flow.

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Section K Part 3

Detail i

The laboratory, operated by OMI employees, is not state certified to analyze for BOD, TSS, or pH.

Page \_\_\_\_\_ of 4

Section \_\_\_\_\_ Part \_\_\_\_\_

Detail \_\_\_\_\_