

July 13, 2015

John Rimmer, General Manager West Memphis Utilities P.O. Box 1868 West Memphis, AR 72301

RE: West Memphis WWTP Inspection

AFIN: 18-00879 Permit No.: AR0022039

Dear Mr. Rimmer:

On April 20 and 21, 2015, I performed Compliance Evaluation, Sanitary Sewer Overflow, and Industrial Stormwater Inspections of the above referenced 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. Copies of the inspection reports are enclosed for your records.

Please refer to the "Summary of Findings" section of each attached inspection report and provide a written response for each violation that was noted. This response should be mailed to the attention of the Water Division Inspection Branch at the address at the bottom of this letter or e-mailed to Water-Inspection-Report@adeq.state.ar.us. This response 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 with all necessary documentation (i.e. photos) is due by July 27, 2015.

If I can be of any assistance, please contact me at walker@adeq.state.ar.us or 870-935-7221 ext.-12.

Sincerely,

Brent L. Walker

District 3 Field Inspector

Brest & Walter

Water Division

ADEQ		WATER DIVISION INSPECTION REPORT							
		AFIN: 18-00879 PI		ERMIT #: AR0022039			DATE: 4/20/2015		
ARKANSAS			OUNTY: 18 Critte	nden	PDS #: 085178		MEDIA: WN		
Dep	partment of Environmental Quality	GF	'S LAT: 35.12421	2 LONG: -90.179	016 L	OCATION:	Entrance		
	FACILITY INFORMAT	ION				TION INFO	RMATION		
	EST Memphis WWTP			FACILITY TYPE: INSPECTOR ID#: 52138 S - State					
502 CITY:	2 South Loop Rd.						TION TYPE: npliance Evaluation		
	est Memphis			DATE(S): ENTRY TIME: EXIT TIME: 4/20/2015 09:45 16:30			PERMIT EFFECTIVE DATE:		
	RESPONSIBLE OFFIC	CIAL	-		9:05	12:45	8/1/2013 PERMIT EXPIRATION DATE:		
	ः / राग्राह hn Rimmer / General Manager						7/31/2018		
COM	PANY:			FAYETTEVILLE SHALE RELATED: N					
	est Memphis Utilities ng address:			FAYETTEVILLE	SHAL	E VIOLATIO	DNS: N		
Ρ.0	D. Box 1868					TON PART	ICIPANTS		
	state, zip: est Memphis AR 72301			Paul Holloway/		or of Waste	water/870-735-9862		
PHON	IE & EXT: / FAX:			Patricia Dixon/L					
B/(0-735-3355 /			Denise Bosnick/Director of Env. Quality/870-702-5141					
	nmer@westmemphisutilities.com			Todd Pedersen/Assistant Manager Josh Grabowski/Water Superintendent					
CC	NTACTED DURING INSPECTION	: No							
	(S=S	atisfac		LUATIONS isfactory, N=Not Applicable/I	Evaluated)			
S	PERMIT	S	FLOW MEASUR		N	STORMW			
S	RECORDS/REPORTS	S	LABORATORY				SITE REVIEW		
S	OPERATION & MAINTENANCE	S		CEIVING WATER	S	+ - +			
S N	SAMPLING OTHER:	S	SLUDGE HAND	LING/DISPOSAL	N	PRETREA	IMENI		
IN	OTHER.		SUMMARY	F FINDINGS					
Th	is Compliance Evaluation Inspect	tion			th a S	anitary Sev	ver		
	erflow/Collection System Inspect		-	-		-			
	,			•	1				
No	violations were noted at the time	of	the inspection.						
	e facility initiated a partial bypass			_					
	m an unusually large snow and ra	ain e	event. This bypa	ss was reported	as rec	quired by tl	ne permit. No further		
act	action is required at this time.								
GENERAL COMMENTS									
Water Division Branch Manager - Jason Bolenbaugh and Inspector - Chris Naus were also present.									
	<i>(</i>)		1 1 1 11						
18.14	INSPECTOR'S SIGNATURE: Brest & Walker			1 -			DATE: 7/40/0045		
IINS	SPECIOR'S SIGNATURE:	Srent L. Walk	er		DATE: 7/13/2015				
	/4	u R	ELL 1						
SU	PERVISOR'S SIGNATURE:	. 1	las	on Rolenhaugh			DATE: 7/13/2015		

Jason Bolenbaugh

SUPERVISOR'S SIGNATURE:

DATE: **7/13/2015**

SECTION A: PERMIT VERIFICATION	
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS	⊠S □M □U □NA □NE
DETAILS:	
1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE:	⊠y □n □na □ne
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES:	□Y □N ☑NA □NE
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT:	Øy □n □na □ne
4. ALL DISCHARGES ARE PERMITTED:	Øy □n □na □ne
SECTION B: RECORDKEEPING AND REPORTING EVALUATION	
RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT	⊠S □M □U □NA □NE
DETAILS:	
ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS:	⊠y □n □na □ne
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE:	Øs Om Ou Ona One
a. DATES AND TIME(S) OF SAMPLING:	Øy □n □na □ne
b. EXACT LOCATION(S) OF SAMPLING:	Øy □n □na □ne
c. NAME OF INDIVIDUAL PERFORMING SAMPLING:	Øy □n □na □ne
d. ANALYTICAL METHODS AND TECHNIQUES:	Øy □n □na □ne
e. RESULTS OF CALIBRATIONS:	Øy □n □na □ne
f. RESULTS OF ANALYSES:	Øy □n □na □ne
g. DATES AND TIMES OF ANALYSES:	✓Y □N □NA □NE
h. NAME OF PERSON(S) PERFORMING ANALYSES:	Øy □n □na □ne
LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE:	Øs Om Ou Ona One
PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR:	Øs Om Ou Ona One
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA:	ØY □N □NA □NE
SECTION C: OPERATIONS AND MAINTENANCE	
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED	☑S □M □U □NA □NE
DETAILS:	
TREATMENT UNITS PROPERLY OPERATED:	⊠s □m □u □na □ne
2. TREATMENT UNITS PROPERLY MAINTAINED:	⊠s □m □u □na □ne
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED:	ØS DM DU DNA DNE
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE:	Øs Om Ou Ona One
5. ALL NEEDED TREATMENT UNITS IN SERVICE:	Øs Om Ou Ona One
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED:	Øs Om Ou Ona One
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED:	Øs 🗆 🗆 🗆 🗆 🗆
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE:	✓Y □N □NA □NE
9. STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED:	Øy □n □na □ne
10. PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED:	Øy On Ona One
11. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR:	⊠y □n □na □ne
12. IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED:	✓Y □N □NA □NE
13. HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS:	✓Y □N □NA □NE
14. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT:	□Y ØN □NA □NE
15. IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT:	□Y □N ☑NA □NE
1	

SECTION D: SAMPLING								
PI	ERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS	☑S □M □U □NA □NE						
DE	ETAILS:							
1.	SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT:	☑y □n □na □ne						
2.	LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES:	☑Y □N □NA □NE						
3.	FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT:	☑Y □N □NA □NE						
4.	SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT:	☑Y □N □NA □NE						
5.	SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT:	☑Y □N □NA □NE						
6.	SAMPLE COLLECTION PROCEDURES ADEQUATE:	☑Y □N □NA □NE						
á	a. SAMPLES REFRIGERATED DURING COMPOSITING:	☑Y □N □NA □NE						
ŀ	D. PROPER PRESERVATION TECHNIQUES USED:	☑Y □N □NA □NE						
(c. CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136:	☑Y □N □NA □NE						
7.	IF MONITORING IS PERFORMED MORE OFTEN THAN REQUIRED ARE RESULTS REPORTED ON THE DMR:	☑Y □N □NA □NE						
SE	ECTION E: FLOW MEASUREMENT							
PI	ERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS	☑S □M □U □NA □NE						
DI	ETAILS:							
1.	PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: TYPE OF DEVICE:	☑Y □N □NA □NE						
2.	FLOW MEASURED AT EACH OUTFALL AS REQUIRED:	⊠y □n □na □ne						
3.	SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED:	☑Y □N □NA □NE						
4.	CALIBRATION FREQUENCY ADEQUATE:	☑Y □N □NA □NE						
5.	RECORDS MAINTAINED OF CALIBRATION PROCEDURES:	☑Y □N □NA □NE						
6.	CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE:	□y □n ☑na □ne						
7.	FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE:	⊠y □n □na □ne						
8.	FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES:	☑Y □N □NA □NE						
9.	HEAD MEASURED AT PROPER LOCATION:	□y □n ☑na □ne						
SE	ECTION F: LABORATORY							
PI	ERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS	☑S □M □U □NA □NE						
DI	ETAILS:							
1.	EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(B) FOR SLUDGES) :	☑Y □N □NA □NE						
2.	IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED:	☑Y □N □NA □NE						
3.	SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT: Suggested improvements to DO calibration recording process	Øy □n □na □ne						
4.	QUALITY CONTROL PROCEDURES ADEQUATE:	☑Y □N □NA □NE						
5.	DUPLICATE SAMPLES ARE ANALYZED ≥10% OF THE TIME:	☑Y □N □NA □NE						
6.	SPIKED SAMPLES ARE ANALYZED ≥10% OF THE TIME:	☑Y □N □NA □NE						
7.	COMMERCIAL LABORATORY USED:	☑Y □N □NA □NE						
í	a. LAB NAME: <u>ETC</u>							
ŀ	D. LAB ADDRESS: Memphis, TN							
(c. PARAMETERS PERFORMED: Nitrate-Nitrite, Phosphorus, Biomonitoring							
8.	BIOMONITORING PROCEDURES ADEQUATE:	Øy □n □na □ne						
á	a. PROPER ORGANISMS USED:	☑Y □N □NA □NE						
ŀ	p. PROPER DILUTION SERIES FOLLOWED:	☑Y □N □NA □NE						
(2. PROPER TEST METHODS AND DURATION:	☑Y □N □NA □NE						
(d. RETESTS AND/OR TRE PERFORMED AS REQUIRED:	□y □n ☑na □ne						

inspection Report. west wempins wwith, Arin. 10-00079, Femili #. AR0022039												
SECTION G: EFFLUENT/RECEIVING WATERS OBSERVATIONS												
BASED ON VISUAL OBSERVATIONS ONLY												
DETAILS: Green color due to flow from EQ basin into plant.												
OUTFALL #:	OIL SHEEN	FLOATING SOLIDS	COLOR	OTHER								
001	None	None	Green									
SECTION H	I: SLUDGE DIS	POSAL										
SLUDGE [DISPOSAL MEI	ETS PERMIT R	REQUIREMENT	ΓS		⊠S □M □	U □NA □NE					
DETAILS:					·							
1. SLUDGE M	IANAGEMENT ADEQU	ATE TO MAINTAIN EF	FLUENT QUALITY:			⊠s □m	□U □NA □NE					
2. SLUDGE R	ECORDS MAINTAINE	O AS REQUIRED BY 40) CFR 503:			□s □м	□u ☑na □ne					
3. FOR LAND	APPLIED SLUDGE, T	YPE OF LAND APPLIE	O TO: (E.G., FOREST,	AGRICULTURAL, PU	BLIC CONTACT SITE): La	<u>ındfill</u>						
SECTION I:	SAMPLING IN	SPECTION PRO	CEDURES									
SAMPLE F	RESULTS WITH	HIN PERMIT R	EQUIREMENT	S			U ⊠NA □NE					
DETAILS:												
1. SAMPLES	. SAMPLES OBTAINED THIS INSPECTION:											
2. TYPE OF S	SAMPLE: GRAB:_	□COMPOSITE:_ N	METHOD: FREQUE	NCY:								
3. SAMPLES												
4. FLOW PRO	FLOW PROPORTIONED SAMPLES OBTAINED:											
5. SAMPLE O	SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE:											
6. SAMPLE R	EPRESENTATIVE OF	VOLUME AND NATUR	E OF DISCHARGE:			□Y	□n Øna □ne					
7. SAMPLE S	PLIT WITH PERMITTE	E:				□Y	□n Øna □ne					
8. CHAIN-OF-	CHAIN-OF-CUSTODY PROCEDURES EMPLOYED:											
9. SAMPLES	. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT:											
SECTION J	: STORM WAT	ER POLLUTION	PREVENTION	PLAN								
STORM W	ATER MANAG	EMENT MEET	S PERMIT RE	QUIREMENTS)		U ⊠NA □NE					
DETAILS:	Industrial Store	<u>mwater is tracke</u>	ed separately u	nder ARR00C40	<u>05</u>							
1. SWPPP UF	PDATED AS NEEDED:	_ DATE OF LAST UP	DATE:			□Y	□n ☑na □ne					
2. SITE MAP	INCLUDING ALL DISC	HARGES AND SURFAC	CE WATERS:			□Y	□n ☑na □ne					
3. POLLUTIO	POLLUTION PREVENTION TEAM IDENTIFIED:											
4. POLLUTIO	POLLUTION PREVENTION TEAM PROPERLY TRAINED:											
5. LIST OF PO	LIST OF POTENTIAL POLLUTANT SOURCES:											
6. LIST OF PO	LIST OF POTENTIAL SOURCES AND PAST SPILLS AND LEAKS:											
7. ALL NON-S	ALL NON-STORM WATER DISCHARGES ARE AUTHORIZED:											
8. LIST OF ST	LIST OF STRUCTURAL BMPS:											
9. LIST OF NO	LIST OF NON-STRUCTURAL BMPS:											
10. BMPS PRO	10. BMPS PROPERLY OPERATED AND MAINTAINED:											
11. INSPECTION	ONS CONDUCTED AS	REQUIRED:				□Y	□N ☑NA □NE					
i .												

DMR Calculation Check

Reporting Period:	From <u>2015</u>		3	1	_ To	2015	3	31			
		Year	Month	Day		Year	Month	Day			
Parameter Checked:	TSS										
		Loading		Concentration							
		_									
		Mass			Monthly						
	Mo. Avg Ibs/day			Mo. A	vg r	ng/l	7-day Avg mg/l				
Reported Value:	1515			20.2			23.3				
Calculated Value:	1515				20.2		23.3				
Permit Value:	1576.3			30			45				
	-										

Equal

If calculated value does not equal reported value, explain:

DMR Calculation Check

Reporting Period:	From	2015	3	1	_ To	2015	3	31			
		Year	Month	Day		Year	Month	Day			
Parameter Checked:		DO	_								
		Loading		Concentration							
	Mo.	Mass Mo. Avg Ibs/day			vg ı		onthly 7-day Avg mg/l				
Reported Value:	N/A				8.4		N/A				
Calculated Value:	N/A			8.4		N/A	1				
Permit Value: N/A				2.0) (min)	N/A				
If calculated value do	es not e	equal repo	rted value, e	explain:	<u>E</u>	<u>qual</u>					