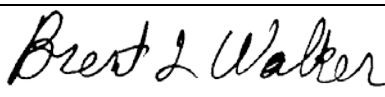

 A R K A N S A S Department of Environmental Quality		WATER DIVISION INSPECTION REPORT					
		AFIN: 18-00879		PERMIT #: AR0022039		DATE: 5/25/2016	
		COUNTY: 18 Crittenden			PDS #: 092038		MEDIA: WN
		GPS LAT: 35.124212 LONG: -90.179016 LOCATION: Entrance					
FACILITY INFORMATION				INSPECTION INFORMATION			
NAME: West Memphis WWTP LOCATION: 502 South Loop Rd. CITY: West Memphis				FACILITY TYPE: 1 - Municipal		INSPECTOR ID#: 52138 S - State	
				FACILITY EVALUATION RATING: N		INSPECTION TYPE: Industrial User	
				DATE(S): 5/25/2016		ENTRY TIME: 11:20	
RESPONSIBLE OFFICIAL						PERMIT EFFECTIVE DATE: 8/1/2013	
						PERMIT EXPIRATION DATE: 7/31/2018	
NAME / TITLE: John Rimmer / General Manager COMPANY: West Memphis Utilities MAILING ADDRESS: P.O. Box 1868 CITY, STATE, ZIP: West Memphis AR 72301 PHONE & EXT. / FAX: 870-735-3355 / EMAIL: jrimmer@westmemphisutilities.com				FAYETTEVILLE SHALE RELATED: N			
CONTACTED DURING INSPECTION: Yes				FAYETTEVILLE SHALE VIOLATIONS: N			
INSPECTION PARTICIPANTS							
NAME/TITLE/PHONE/FAX/EMAIL/ETC.: West Memphis: Denise Bosnick, Marvin Jones, Tommie Butler Quala: Willie Brown, Marvin LeFlore ADEQ: Brent Walker, Sarah Frasher							
AREA EVALUATIONS							
(S=Satisfactory, M=Marginal, U=Unsatisfactory, N=Not Applicable/Evaluated)							
S	PERMIT	N	FLOW MEASUREMENT	N	STORMWATER		
N	RECORDS/REPORTS	N	LABORATORY	N	FACILITY SITE REVIEW		
U	OPERATION & MAINTENANCE	N	EFFLUENT/RECEIVING WATER	N	SELF-MONITORING PROGRAM		
N	SAMPLING	N	SLUDGE HANDLING/DISPOSAL	U	PRETREATMENT		
N	OTHER:						
SUMMARY OF FINDINGS							
This was an Industrial User Inspection of: Quala Services, LLC., 400 Mound City Rd., West Memphis, AR 72301 The following areas of concern were noted:							
<ol style="list-style-type: none"> 1. Sampling location is suitable for representative sampling, but may not provide adequate protection against tampering. 2. Facility personnel were not familiar with pretreatment monitoring requirements and relationship with POTW staff appeared strained. 3. There was residue on the side of the outdoor wastewater holding tank indicating a recent overflow/overflow. Additionally, the secondary containment for the outdoor wastewater holding tank contained visibly contaminated water (Photos 1-3). 4. One of the drain valves for the secondary containment had a small leak (Photo 4). 							
GENERAL COMMENTS							
Inspection was performed as part of a Pretreatment Compliance Inspection. See the full PCI report for details.							
INSPECTOR'S SIGNATURE:  Brent L. Walker				DATE: 7/25/2016			
SUPERVISOR'S SIGNATURE:  Jason Bolenbaugh				DATE: 8/1/2016			

Industrial User Site Visit

Name of Industry: Quala Services, LLC

Industry Contacts: Willie Brown, Marvin LeFlore

Type of Industry: Internal and External Truck Washing

Date of Visit: 5/25/2016 @ 1120 - 1210

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> X* </u>	Yes	<u> </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:

Sampling location is suitable for representative sampling, but may not provide adequate protection against tampering.
Facility personnel were not familiar with pretreatment monitoring requirements and relationship with POTW staff appeared strained.
There was residue on the side of the outdoor wastewater holding tank indicating a recent overflow/overflow.
Additionally, the secondary containment for the outdoor wastewater holding tank contained visibly contaminated water.
One of the drain valves for the secondary containment had a small leak.

Visit Conducted by: *Brent L Walker* **Brent L. Walker** Date: 7/25/2016

Water Division Photographic Evidence Sheet

Location:	Quala Services, LLC		
Photographer:	Brent Walker	Date:	5/25/2016
Witness:	Sarah Frasher, Denise Bosnick	Time:	1158
Description:	Residue on side of outdoor wastewater tank indicating recent overflow.		



Photographer:	Brent Walker	Date:	5/25/2016
Witness:	Sarah Frasher, Denise Bosnick	Time:	1154
Description:	Visibly contaminated water in secondary containment for outdoor wastewater tank.		



Water Division Photographic Evidence Sheet

Location:	Quala Services, LLC			
Photographer:	Brent Walker	Date:	5/25/2016	
Witness:	Sarah Frasher, Denise Bosnick	Time:	1154	
Description:	Visibly contaminated water in secondary containment for outdoor wastewater tank.		Photo #:	3



Photographer:	Brent Walker	Date:	5/25/2016	
Witness:	Sarah Frasher, Denise Bosnick	Time:	1157	
Description:	Secondary containment drain valves. Note small leak from valve on right – covered with plastic bag.		Photo #:	4



From: [Denise Bosnick](#)
To: [Water-Inspection-Report; Walker, Brent](#)
Subject: pretreatment inspection report
Date: Wednesday, August 31, 2016 12:11:13 PM
Attachments: [Pretreatment Inspection 2016.pdf](#)
[Signed Response Letter to ADEQ.pdf](#)
[Quala Attachments.pdf](#)
[Warren Unilube Attachments.pdf](#)
[Wastewater Solutions Attachments.pdf](#)

Enclosed is a copy of the Pretreatment Inspection, Response to the Pretreatment Inspection and Attachments that go with the response.

Denise Bosnick
Director Environmental Quality
West Memphis Utility
P.O. Box 1868
604 East Cooper
West Memphis, Arkansas 72303
870-702-5141
870-732-7626 (fax)
dbosnick@citywm.com

ADEQ

ARKANSAS
Department of Environmental Quality

August 1, 2016

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

RE: West Memphis WWTP Pretreatment Inspection
AFIN: 18-00879 Permit No.: AR0022039

Dear Mr. Rimmer:

On May 24 and 25, 2016, I performed a Pretreatment Compliance Inspection 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. A copy of the inspection report is enclosed for your records.

Please refer to the "Summary of Findings" section of the 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 **August 15, 2016**.

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
Water Division

<h1 style="margin:0;">ADEQ</h1> <p style="margin:0;">ARKANSAS Department of Environmental Quality</p>	WATER DIVISION INSPECTION REPORT		
	AFIN: 18-00879	PERMIT #: AR0022039	DATE: 5/25/2016
	COUNTY: 18 Crittenden	PDS #: 092036	MEDIA: WN
	GPS LAT: 35.124212 LONG: -90.179016 LOCATION: Entrance		

FACILITY INFORMATION	INSPECTION INFORMATION
NAME: West Memphis WWTP LOCATION: 502 South Loop Rd. CITY: West Memphis	FACILITY TYPE: 1 - Municipal INSPECTOR ID: 52138 S - State FACILITY EVALUATION RATING: N INSPECTION TYPE: Pretreatment Compliance DATE(S): 5/25/2016 ENTRY TIME: 09:45 EXIT TIME: 15:30 PERMIT EFFECTIVE DATE: 8/1/2013 5/24/2016 11:30 15:30 PERMIT EXPIRATION DATE: 7/31/2018
RESPONSIBLE OFFICIAL	INSPECTION PARTICIPANTS
NAME / TITLE: John Rimmer / General Manager COMPANY: West Memphis Utilities MAILING ADDRESS: P.O. Box 1868 CITY, STATE, ZIP: West Memphis AR 72301 PHONE & EXT. / FAX: 870-735-3355 EMAIL: jrimmer@westmemphisutilities.com	FAYETTEVILLE SHALE RELATED: N FAYETTEVILLE SHALE VIOLATIONS: N NAME/TITLE/PHONE/FAX/EMAIL/ETC.: West Memphis: Denise Bosnick, Marvin Jones, Tommie Butler ADEQ: Brent Walker, Sarah Frasher
CONTACTED DURING INSPECTION: Yes	

AREA EVALUATIONS			
(S=Satisfactory, M=Marginal, U=Unsatisfactory, N=Not Applicable/Evaluated)			
S	PERMIT	N	FLOW MEASUREMENT
M	RECORDS/REPORTS	N	LABORATORY
N	OPERATION & MAINTENANCE	N	EFFLUENT/RECEIVING WATER
N	SAMPLING	N	SLUDGE HANDLING/DISPOSAL
N	OTHER:	N	STORMWATER
N		N	FACILITY SITE REVIEW
N		N	SELF-MONITORING PROGRAM
N		N	PRETREATMENT

SUMMARY OF FINDINGS

The following violations were noted:

1. SIUs (Significant Industrial Users) are not being inspected annually as required by the approved program. Additionally, detailed documentation is not being kept.
2. Complete BMRs (Baseline Monitoring Reports) are required for all Categorical IUs.
 - a. The BMR for Grace Trailer did not have a process flow diagram.
 - b. Wastewater Solutions had not submitted a BMR.
3. Industrial User violations are not being addressed in a timely fashion and/or enforcement actions are not escalated in response to repeated violations (5 of 6 SIUs are in SNC).
4. The following items were noted during the Industrial User Inspection of Quala Services, LLC.:
 - a. Sampling location is suitable for representative sampling, but may not provide adequate protection against tampering.
 - b. Facility personnel were not familiar with pretreatment monitoring requirements and relationship with POTW staff appeared strained.
 - c. There was residue on the side of the outdoor wastewater holding tank indicating a recent overflow/overflow. Additionally, the secondary containment for the outdoor wastewater holding tank contained visibly contaminated water.
 - d. There was a small leak from one of the secondary containment drain valves that had been covered with a plastic bag.

GENERAL COMMENTS

See the attached PCI report and separate Industrial User Visit reports for specific details.

INSPECTOR'S SIGNATURE: <i>Brent L Walker</i> Brent L. Walker	DATE: 7/25/2016
SUPERVISOR'S SIGNATURE: <i>Jason R Bolenbaugh</i> Jason Bolenbaugh	DATE: 8/1/2016

Inspection Report: **West Memphis WWTP**, AFIN: **18-00879**, Permit #: **AR0022039**
ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY

PRETREATMENT COMPLIANCE INSPECTION (PCI) REPORT

Name of Municipality: West Memphis

AFIN Number: 18-00879

NPDES Permit Number(s): AR0022039

Program Tracked under NPDES Permit Number: AR0022039

Fact Sheet Preparation Date: Annual Report Only

Date of Last PCI/Audit: Last PCI December 7 and 9, 2011

Date of Last Annual Report: April 20, 2016

Name of Inspector: Brent Walker & Sarah Frasher

Date PCI Performed: May 24 & 25, 2016

Name, Title, and Telephone Number of Facility Representative:
Denise Bosnick, Director of Environmental Quality

Name and Title of Other Participants:
Marvin Jones - Lab Supervisor, Tommie Butler - Field Technician

Number of IUs Visited: 2

Name(s) of IUs Visited: Wastewater Solutions & Quala Services

AN IU SITE VISIT FORM SHOULD BE COMPLETED FOR EACH IU VISITED

NOTE: ANY QUESTION PRINTED IN ALL CAPS AND BOLD PRINT INDICATED A REGULATORY REQUIREMENT AND MUST BE ANSWERED FOR THE PCI REPORT TO BE COMPLETE. A NO ANSWER TO ONE OF THESE QUESTIONS SHOULD RESULT IN AN UNSATISFACTORY RATING.

Form approved July 1989

A. INDUSTRIAL USER SURVEY

1. List any Significant Industrial Users (SIUs) which have been added or deleted from the program since the last audit or inspection. Wastewater Solutions Added; Warren Unilube now classified as an SIU
2. Has ADEQ or EPA been notified of these changes? Yes
3. HAS THE INDUSTRIAL USER SURVEY BEEN KEPT UPDATED? Yes
4. What procedures are being used to update the IU Survey? New city permits, new connections, Code Enforcement, Economic Development Currently working on obtaining responses to mailed survey from all potential IUs.
5. Total number of Significant Industrial Users, according to the definition used by the POTW. (This number must be greater than or equal to the answer to question 6) 6
6. Number of Categorical Industrial Users: 5
7. How does the POTW determine the appropriate categorical standards to apply to an IU? NAICS & 40 CFR

8. List all categorical IUs discharging under the approved (such program. Include the name of the IU, the regulatory category as Metal Finishing), and the regulated process (phosphating, zinc plating, etc.) Additional listings can be made in the comments section if necessary.

Name of IU:	Category:	Regulated Process:
Quala	Truck Wash	Int./Ext. Truck Wash
Grace Trailer	Truck Wash	Int./Ext. Truck Wash
Wastewater Solutions	Centralized Waste Treatment/Multi-stream Sub Part D.	Treatment of Hauled Wastewater
Stateside Steel & Wire	Metal Finishing	Metal Plating
Automated Conveyors	Metal Finishing	Metal Plating

B. LOCAL LIMITS

1. IS THE POTW APPLYING LOCAL LIMITS WHICH HAVE BEEN APPROVED BY ADEQ OR EPA? Yes, no specific numeric limits for current IU's Applied when appropriate

2. Describe any apparent problems with the local limits. None

3. How often are pollutant scans of POTW influent, effluent, and sludge performed by the POTW? Does this fulfill the requirements of the approved program (as described in the fact sheet) and part III of the NPDES permit?

Pollutant:	Frequency:	Requirement in		Comments:
		Permit:	Program:	
Metals:				
Influent:	<u>4/yr</u>	<u>4/yr</u>	<u>None</u>	<u>None</u>
Effluent:	<u>4/yr</u>	<u>4/yr</u>	<u>None</u>	<u>None</u>
Sludge:	<u>1/yr</u>	<u>N/A</u>	<u>None</u>	<u>None</u>
Organics:				
Influent:	<u>1/yr</u>	<u>1/yr</u>	<u>None</u>	<u>None</u>
Effluent:	<u>1/yr</u>	<u>1/yr</u>	<u>None</u>	<u>None</u>
Sludge:	<u>1/yr</u>	<u>N/A</u>	<u>None</u>	<u>None</u>

4. Have there been any inhibitions or upsets at the POTW (since the last PCI of Audit) which were believed to be caused by industrial discharges? If so, describe the action taken by the City to ensure that the incident would not recur. Were these actions effective?
Warren Unilube discharged ~6000 gals of oil/transmission fluid;
Caught at Station 8 and vacuumed out before reaching WWTP.
Warren Unilube has a history of discharging large volumes of oil
resulting
in upsets of the POTW.

C. INDUSTRIAL USER CONTROL MECHANISM

1. Is the POTW using the type of control mechanism (permit, agreement, etc.) required by the approved program? Yes, permit

2. How many IU permits (or other control documents) have been issued? 6 SIU, 3 NSIU

3. DO ALL SIGNIFICANT IUS HAVE CURRENT (UNEXPIRED) CONTROL DOCUMENTS? IF NOT, LIST ALL UNPERMITTED SIUS, THE DATE OF EXPIRATION OF THEIR PREVIOUS PERMIT (IF APPLICABLE), AND THE REASON FOR DELAY IN ISSUING THE REQUIRED DOCUMENT.
Yes, all expire 5/31/2017

4. Does the control document contain the following items?

An expiration date: Yes

Discharge limitations: Yes

If the program requires self-monitoring by the IUs, do the Permits contain:

IU self-monitoring requirements: N/A

IU reporting requirements: N/A

5. Indicate which of the following recommended standard conditions are contained in the control documents:

Sample location: Yes

Type of sample: Yes

Monitoring frequency: Yes

Bypass prohibition: Covered by Sewer Use Ordinance - suggest adding to permits

Right of entry: Yes

Nontransferability: Yes

Revocation clause: Yes

Penalty Provisions: Yes

Slug load notification: Yes

Notification of process change: Yes

D. MONITORING OF IUS BY POTW

1. Indicate current inspection and sampling frequency and program requirement below:

	Current frequency:	Program Requirement:
Sampling:		
categorical IUs	<u>1-2/month (except Automated Conveyor 1/yr)</u>	<u>1/yr</u>
other SIUs	<u>2/month</u>	<u>1/yr</u>
Inspection:		
categorical IUs	<u>Only 3 were inspected in the last year</u>	<u>1/yr</u>
other SIUs	<u>Not Inspected</u>	<u>1/yr</u>

2. HAS EACH SIU BEEN INSPECTED AND SAMPLED AT THE FREQUENCY REQUIRED BY THE APPROVED PROGRAM? No

3. Are inspections announced or unannounced? Both

4. Are records kept of each inspection? Not Reviewed*

5. Does the inspection report contain an adequate description of the following:

Date and time of inspection: Not Reviewed*

Officials present: Not Reviewed*

Inspection of chemical storage areas: Not Reviewed*

Description of regulated processes, categorical waste streams, and discharge location of these waste streams: Not Reviewed*

Inspection of the pretreatment facilities: Not Reviewed*

Review of self-monitoring records: N/A

Observation of IU self-monitoring procedures: N/A

Verification that approved analytical techniques are used: N/A

Verification of IU flow measurement (where required): N/A

6. Overall adequacy of inspection documentation:

*All SIUs were not inspected at least once in the last year as required

7. DOES THE POTW SAMPLE IUS FOR ALL POLLUTANTS REGULATED IN THEIR PERMITS? (IT IS NOT NECESSARY TO SAMPLE FOR ALL POLLUTANTS EVERY TIME, BUT IT MUST BE DONE PERIODICALLY).
Yes
-
8. Are analyses performed in accordance with EPA-approved methods (40 CFR 136)? Yes
-
9. Are sampling and flow monitoring equipment properly maintained? Yes
-
10. Is the POTW keeping proper field notes and chain of custody forms? Yes
-
11. Is the sampling location representative of the discharge to the collection system? Yes
-
12. Are sampling locations identified in POTW records? Yes
-
13. Are sampling services available in an emergency? Yes
-
14. What are the POTW's procedures for tracking receipt and review of IU reports, such as BMR's, semi-annual reports, progress reports, bypass reports, and self-monitoring reports? Reports not required; Director of Environmental Quality keeps track of violations an required responses to letters.
-
15. ARE SELF-MONITORING REPORTS REVIEWED TO VERIFY THAT ANALYSES WERE PERFORMED FOR ALL REGULATED PARAMETERS, AND TO EVALUATE COMPLIANCE WITH EFFLUENT LIMITS? N/A
-
16. IF VIOLATIONS ARE FOUND IN REPORTS, DOES THE POTW RESPOND TO ALL VIOLATIONS? N/A
-
-

17. What are the POTW's procedures for following up violations?
NOV issued for pH @ time of sample/analysis
NOV for others when results received
Response required within 15 days.

18. HAS THE POTW REVIEWED BMRS FOR COMPLIANCE WITH 40 CFR
403.12(b)?: No BMRs for Wastewater Solutions

Review a Baseline Monitoring Report from the POTW's file,
and indicate which of the following items can be identified
in the BMR:

Name and address: Yes (Grace Trailer)

Other environmental permits held: Yes

Description of operations: Yes

Process flow diagrams: No

Flow measurements: Yes

Measurements of regulated pollutants: Yes

Certification of compliance by the IU: Yes

Compliance schedule (if needed): N/A

19. Additional comments on the POTW's inspection and sampling
procedures:
All SIUs must be inspected annually as required by the approved
Pretreatment Program. Thorough documentation must be kept.
Complete BMRs are required for all Categorical IUs
The BMR for Grace Trailer did not have a process flow diagram
Wastewater Solutions had not submitted a BMR

E. Enforcement

1. HAS THE POTW IMPLEMENTED ENFORCEMENT RESPONSE PROCEDURES TO ADEQUATELY ADDRESS EVERY IU VIOLATION OF PRETREATMENT STANDARDS AND REQUIREMENTS? No, violations are not being addressed in a timely fashion and/or enforcement actions are not escalated in response to repeated violations (5 of 6 SIU are in SNC)

2. How does the POTW respond to the following violations?

Effluent limitations: NOV

Late reports: Letter - very few reports required

Unpermitted discharges: Letter & depends on circumstances

Slug loads or spills: Letter and NOV

3. IS THE LIST OF SIGNIFICANT VIOLATORS PUBLISHED BY THE POTW DEVELOPED IN ACCORDANCE WITH EPA REGION VI CRITERIA FOR SIGNIFICANT VIOLATING INDUSTRIAL USER (DATED AUGUST 22, 1985)? Yes

4. List the SIUs which have met the criteria for Significant Violator within the last 12 months, and describe the enforcement action which has been taken by the POTW. If construction is required, please indicate whether the IU has been placed on an enforceable compliance schedule.

Name:	Type of Violation:	Enforcement Action:	Compliance Deadline:
Automated Conveyor	Limits	2 NOV	Not Set
Quala	Limits	9 NOV	11/23/2015
Stateside Steel	Limits	3 NOV	Not Set
Wastewater Solutions	Limits	16 NOV	Not Set
Warren Unilube	Spill	1 NOV	10/19/2015

5. Comments on the POTW's enforcement procedures:
Violations are not being addressed in a timely fashion and/or enforcement actions are not escalated in response to repeated violations (5 of 6 SIU are in Significant Non-Compliance)
-
-

F. POTW'S PRETREATMENT ORGANIZATION STRUCTURE

1. Is the program structure essentially the same as that presented in the approved pretreatment program? Yes
-
2. Are staffing levels adequate? Yes
-
3. Are the responsible officials familiar with the approved program? Yes
-

G. MULTIJURISDICTIONAL ISSUES

1. List any IUs which are located outside of the jurisdictional area of the POTW:
None
-
2. Does the POTW have adequate procedures for controlling IUs located outside its jurisdictional area? N/A
-
3. Does the POTW have copies of permits for IUs in other cities? N/A
-
4. Have any of these IUs met the criteria for Significant Violator? If so, have they been published by the POTW in its annual list of Significant Violators? N/A
-
5. Comments on multijurisdictional issues: None
-
-

Inspection Report: **West Memphis WWTP, AFIN: 18-00879, Permit #: AR0022039**
PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Wastewater Solutions, LLC

POTW Name: West Memphis

Industry Contacts: Roger Woolbright

Date and Time of Visit: 5/25/2016 @ 1045 - 1120

Description of Manufacturing Process:
Centralized Waste Treatment

Sources of Process Wastewater:
Facility collects and hauls wastewater from multiple sources

Categorical Industry? Yes

Basis for Limits: 40 CFR 437.47(b) & Local Sewer Use Ordinance

Point of Application: Prior to discharge to city

Description of Pretreatment Equipment and Procedures:
Oil & Water Separator, DAF, pH adjustment, polymer addition, clarifier

Spill Prevention and Solvent Management Procedures:
No floor drains, very few chemical stored onsite.
*Secondary containment may be needed around holding tanks.

Sampling Location and Equipment:
Composite sampler outside of building prior to discharge to city sewer

Inspection Report: **West Memphis WWTP, AFIN: 18-00879, Permit #: AR0022039**
PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Quala Services, LLC

POTW Name: West Memphis

Industry Contacts: Willie Brown, Marvin LeFlore

Date and Time of Visit: 5/25/2016 @ 1120 - 1210

Description of Manufacturing Process:
Internal and external truck washing. Washout of tankers used to haul various materials.

Sources of Process Wastewater:
Internal and external truck washing

Categorical Industry? Yes

Basis for Limits: 40 CFR and Local Sewer Use Ordinance

Point of Application: Prior to discharge to city

Description of Pretreatment Equipment and Procedures:
Aeration, settling tanks, polymer/chemical addition, DAF

Spill Prevention and Solvent Management Procedures:
Indoor chemical storage areas with no floor drains.
Secondary containment around outdoor wastewater holding tank - evidence of overflow from tank with visible contaminated water in secondary containment.
Small leak from secondary containment drain valve covered with a plastic bag.

Sampling Location and Equipment:
Composite sampler at weir after pretreatment equipment.
Sampling location is suitable for representative sampling, but may not provide adequate protection against tampering.

Inspection Report: **West Memphis WWTP**, AFIN: 18-00879, Permit #: **AR0022039**

PRETREATMENT COMPLIANCE INSPECTION

PPETS CODE SHEET

PRETREATMENT COMPLIANCE INSPECTION (PCI)

		CODE
INSPECTOR'S NAME:	<u>Brent Walker</u>	
NAME OF FACILITY:	<u>City of West Memphis WWTP</u>	
PERMIT NUMBER USED TO TRACK PROGRAM:	<u>AR0022039</u>	NPID
DATE OF PCI:	<u>May 24 & 25, 2016</u>	DTIA

PPETS WENDB DATA ELEMENTS

NUMBER OF SIGNIFICANT IUS (SIUS):	<u>6</u>	SIUS
NUMBER OF CATEGORICAL IUS:	<u>5</u>	CIUS
SIUS NOT SAMPLED OR INSPECTED BY POTW:	<u>3</u>	NOIN
SIUS WITHOUT CONTROL MECHANISM:	<u></u>	NOCM
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH STANDARDS OR REPORTING:	<u>5</u>	PSNC
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH SELF-MONITORING REQUIREMENTS:	<u>0</u>	MSNC
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH SELF-MONITORING AND NOT INSPECTED OR SAMPLED BY POTW:	<u>0</u>	SNIN

 A R K A N S A S Department of Environmental Quality		WATER DIVISION INSPECTION REPORT			
		AFIN: 18-00879	PERMIT #: AR0022039	DATE: 5/25/2016	
COUNTY: 18 Crittenden		PDS #: 092037	MEDIA: WN		
GPS LAT: 35.124212 LONG: -90.179016 LOCATION: Entrance					
FACILITY INFORMATION		INSPECTION INFORMATION			
NAME: West Memphis WWTP LOCATION: 502 South Loop Rd. CITY: West Memphis		FACILITY TYPE: 1 - Municipal	INSPECTOR ID#: 52138 S - State		
RESPONSIBLE OFFICIAL NAME / TITLE: John Rimmer / General Manager COMPANY: West Memphis Utilities MAILING ADDRESS: P.O. Box 1868 CITY, STATE, ZIP: West Memphis AR 72301 PHONE & EXT. / FAX: 870-735-3355 / EMAIL: jrimmer@westmemphisutilities.com CONTACTED DURING INSPECTION: Yes		FACILITY EVALUATION RATING: N	INSPECTION TYPE: Industrial User		
		DATE(S): 5/25/2016	ENTRY TIME: 10:45	EXIT TIME: 11:20	PERMIT EFFECTIVE DATE: 8/1/2013
					PERMIT EXPIRATION DATE: 7/31/2018
		FAYETTEVILLE SHALE RELATED: N			
		FAYETTEVILLE SHALE VIOLATIONS: N			
INSPECTION PARTICIPANTS					
NAME/TITLE/PHONE/FAX/EMAIL/ETC.: West Memphis: Denise Bosnick, Marvin Jones, Tommie Butler Wastewater Solutions: Roger Woolbright ADEQ: Brent Walker, Sarah Frasher					
AREA EVALUATIONS					
<small>(S=Satisfactory, M=Marginal, U=Unsatisfactory, N=Not Applicable/Evaluated)</small>					
S	PERMIT	N	FLOW MEASUREMENT	N	STORMWATER
N	RECORDS/REPORTS	N	LABORATORY	N	FACILITY SITE REVIEW
S	OPERATION & MAINTENANCE	N	EFFLUENT/RECEIVING WATER	N	SELF-MONITORING PROGRAM
N	SAMPLING	N	SLUDGE HANDLING/DISPOSAL	S	PRETREATMENT
N	OTHER:				
SUMMARY OF FINDINGS					
This was an Industrial User Inspection of: Wastewater Solutions, LLC., 408 Mound City Rd., West Memphis, AR 72301 No specific areas of concern were noted at the time of the inspection.					
GENERAL COMMENTS					
Inspection was performed as part of a Pretreatment Compliance Inspection. See the full PCI report for details.					
INSPECTOR'S SIGNATURE: Brent L. Walker				DATE: 7/25/2016	
SUPERVISOR'S SIGNATURE: Jason Bolenbaugh				DATE: 8/1/2016	

Industrial User Site Visit

Name of Industry: Wastewater Solutions, LLC

Industry Contacts: Roger Woolbright

Type of Industry: Centralized Waste Treatment

Date of Visit: 5/25/2016 @ 1045 - 1120

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> </u>	Yes	<u> X </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> X </u>	Yes	<u> </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> X </u>	Yes	<u> </u>	No	<u> </u>	N/A
10.	Industry familiar with limits and requirements?	<u> X </u>	Yes	<u> </u>	No	<u> </u>	N/A

Additional Comments:



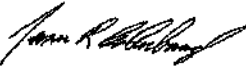
Facility is well maintained and familiar with pretreatment requirements.

Visit Conducted by:

Brent L. Walker Brent L. Walker

Date:

7/25/2016

 A R K A N S A S Department of Environmental Quality		WATER DIVISION INSPECTION REPORT			
		AFIN: 18-00879	PERMIT #: AR0022039	DATE: 5/25/2016	
COUNTY: 18 Crittenden		PDS #: 092038	MEDIA: WN		
GPS LAT: 35.124212 LONG: -90.179016 LOCATION: Entrance					
FACILITY INFORMATION		INSPECTION INFORMATION			
NAME: West Memphis WWTP LOCATION: 502 South Loop Rd. CITY: West Memphis		FACILITY TYPE: 1 - Municipal	INSPECTOR ID#: 52138 S - State		
RESPONSIBLE OFFICIAL NAME / TITLE: John Rimmer / General Manager COMPANY: West Memphis Utilities MAILING ADDRESS: P.O. Box 1868 CITY, STATE, ZIP: West Memphis AR 72301 PHONE & EXT. / FAX: 870-735-3355 / EMAIL: jrimmer@westmemphisutilities.com CONTACTED DURING INSPECTION: Yes		FACILITY EVALUATION RATING: N	INSPECTION TYPE: Industrial User		
		DATE(S): 5/25/2016	ENTRY TIME: 11:20	EXIT TIME: 12:10	PERMIT EFFECTIVE DATE: 8/1/2013
					PERMIT EXPIRATION DATE: 7/31/2018
		FAYETTEVILLE SHALE RELATED: N			
		FAYETTEVILLE SHALE VIOLATIONS: N			
INSPECTION PARTICIPANTS					
NAME/TITLE/PHONE/FAX/EMAIL/ETC.: West Memphis: Denise Bosnick, Marvin Jones, Tommie Butler Quala: Willie Brown, Marvin LeFlore ADEQ: Brent Walker, Sarah Frasher					
AREA EVALUATIONS					
<small>(S=Satisfactory, M=Marginal, U=Unsatisfactory, N=Not Applicable/Evaluated)</small>					
S	PERMIT	N	FLOW MEASUREMENT	N	STORMWATER
N	RECORDS/REPORTS	N	LABORATORY	N	FACILITY SITE REVIEW
U	OPERATION & MAINTENANCE	N	EFFLUENT/RECEIVING WATER	N	SELF-MONITORING PROGRAM
N	SAMPLING	N	SLUDGE HANDLING/DISPOSAL	U	PRETREATMENT
N	OTHER:				
SUMMARY OF FINDINGS					
This was an Industrial User Inspection of: Quala Services, LLC., 400 Mound City Rd., West Memphis, AR 72301					
The following areas of concern were noted:					
<ol style="list-style-type: none"> 1. Sampling location is suitable for representative sampling, but may not provide adequate protection against tampering. 2. Facility personnel were not familiar with pretreatment monitoring requirements and relationship with POTW staff appeared strained. 3. There was residue on the side of the outdoor wastewater holding tank indicating a recent overflow/overflow. Additionally, the secondary containment for the outdoor wastewater holding tank contained visibly contaminated water (Photos 1-3). 4. One of the drain valves for the secondary containment had a small leak (Photo 4). 					
GENERAL COMMENTS					
Inspection was performed as part of a Pretreatment Compliance Inspection. See the full PCI report for details.					
INSPECTOR'S SIGNATURE:  Brent L. Walker				DATE: 7/25/2016	
SUPERVISOR'S SIGNATURE:  Jason Bolenbaugh				DATE: 8/1/2016	

Industrial User Site Visit

Name of Industry: Quala Services, LLC

Industry Contacts: Willie Brown, Marvin LeFlore

Type of Industry: Internal and External Truck Washing

Date of Visit: 5/25/2016 @ 1120 - 1210

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> X* </u>	Yes	<u> </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:

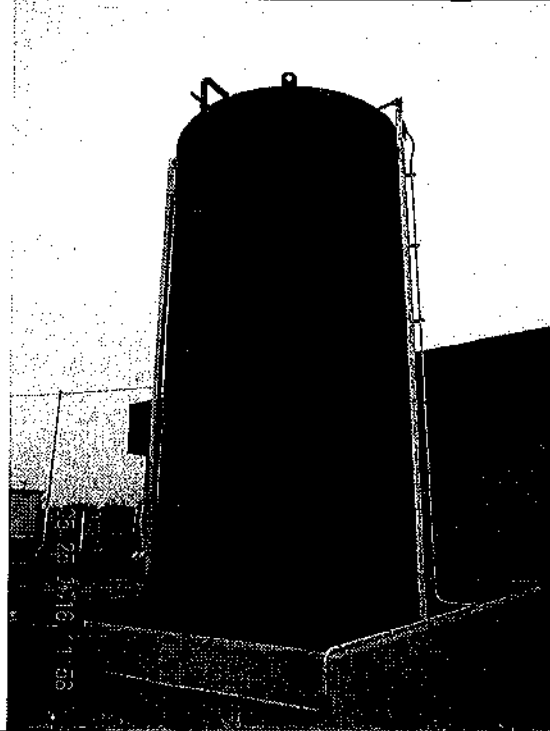
Sampling location is suitable for representative sampling, but may not provide adequate protection against tampering.
Facility personnel were not familiar with pretreatment monitoring requirements and relationship with POTW staff appeared strained.
There was residue on the side of the outdoor wastewater holding tank indicating a recent overflow/overflow.
Additionally, the secondary containment for the outdoor wastewater holding tank contained visibly contaminated water.
One of the drain valves for the secondary containment had a small leak.

Visit Conducted by: Brent L Walker Brent L. Walker

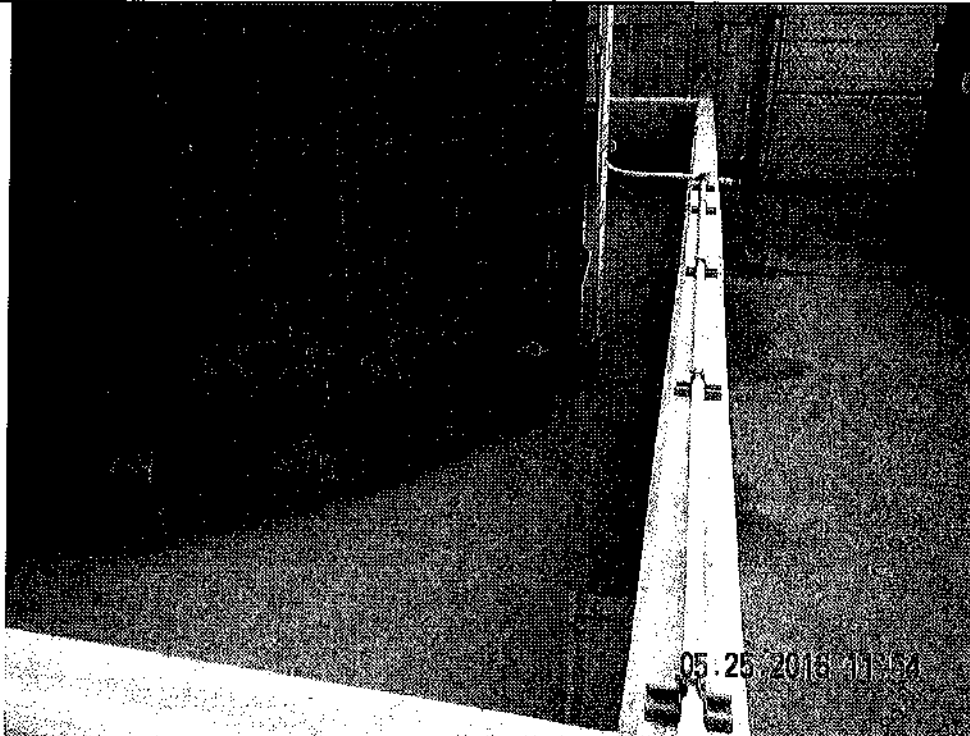
Date: 7/25/2016

Water Division Photographic Evidence Sheet

Location:	Quala Services, LLC		
Photographer:	Brent Walker	Date:	5/25/2016
Time:	1158	Witness:	Sarah Frasher, Denise Bosnick
Photo #:	1	Description:	Residue on side of outdoor wastewater tank indicating recent overflow.

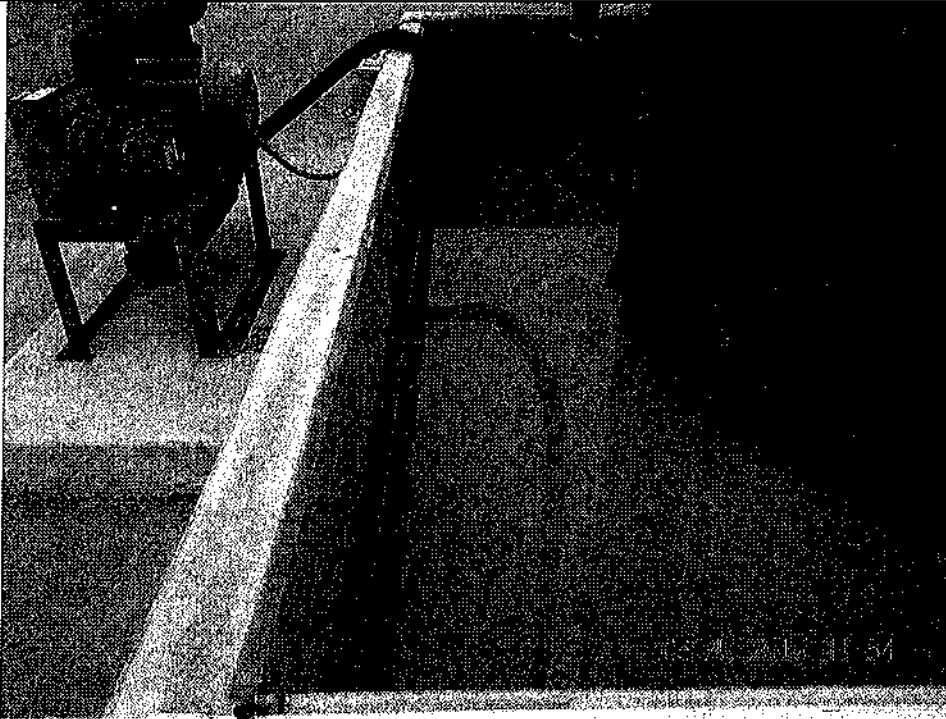


Photographer:	Brent Walker	Date:	5/25/2016
Time:	1154	Witness:	Sarah Frasher, Denise Bosnick
Photo #:	2	Description:	Visibly contaminated water in secondary containment for outdoor wastewater tank.



Water Division Photographic Evidence Sheet

Location:	Quala Services, LLC		
Photographer:	Brent Walker	Date:	5/25/2016
Witness:	Sarah Frasher, Denise Bosnick	Time:	1154
		Photo #:	3
Description:	Visibly contaminated water in secondary containment for outdoor wastewater tank.		



Photographer:	Brent Walker	Date:	5/25/2016
Witness:	Sarah Frasher, Denise Bosnick	Time:	1157
		Photo #:	4
Description:	Secondary containment drain valves. Note small leak from valve on right – covered with plastic bag.		





WEST MEMPHIS UTILITY COMMISSION

P O Box 1868 604 East Cooper
Phone: 870-735-3355 Fax: 870-732-7623
West Memphis, AR 72301

August 31, 2016

Water Division Inspection Branch
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, Arkansas 72218-5317

Re: West Memphis Pretreatment Compliance Inspection
AFIN-18-00879 Permit No: AR0022039

Response to the finding on May 24-25, 2016 Pretreatment Compliance Inspection. The initial due date was August 15, 2016 but was extended to August 31, 2016 by District 3 Field Inspector Brent Walker.

- 1) Significant Industrial Users are not being inspected annually as required by the approved program. Additionally, detailed documentation is not being kept.

Two of the five Significant Industrial Users were inspected. The documentation was not typed and in their file. The information was hand written on paper in their notebooks. All five inspections on the Categorical Industrial Users will be performed and documented by September 30, 2016 and documentation will be provided to your office as well to Field Inspector Brent Walker.

- 2) Complete BMR'S are required for all Categorical IU'S.
 - a) The BMR for Grace Trailer did not have a process flow diagram
 - b) Wastewater Solutions had not submitted a BMR.

The issue with Grace Trailer Service has been addressed and they are in the process of submitting a process flow diagram.

Wastewater Solutions has sent in a BMR with a process flow diagram since this inspection. A copy is attached to this letter.

- 3) Industrial User violations are not being addressed in a timely fashion and/or enforcement actions are not escalated in response to repeated violations (5 of 6 SIUs are in SNC).

Automated Conveyor Systems
3850 Southland Drive

Several years ago, Automated Conveyor Systems went to Zero Discharge. The only time that they discharge is when they clean the parts washer. Usually that is only one time per year and it's usually at the first of the year. However, in 2015 they discharged three (3) time. With them only discharging one time a year that are in non-compliance.

They are adding an addition on their facility and things may change concerning the parts washer. If nothing changes I will from now on pull a sample before they discharge and make them hold the water until the results are back. If they are out of compliance they will either have to hold the water and treat it or they will have to have a company come out and pump the washer out.

Quala Services
400 Mound City Road

They did receive several Notices of Violation. The eighth notice included an Administrative Compliance Order. They have fulfilled the requirements of the Administrative Compliance Order. A copy is attached with this letter.

Wastewater Solutions, LLC
408 Mound City Road

They are a relatively new business and did have numerous violations and I was working with to attempt to find the problem. They went back and looked at all the profiles from companies that they except wastewater from and we did numerous test in trying to locate the source. After all the testing we discover that the initial load that contained the parameter that they were in violation of had remained within their treatment system. They had to their system completely drained and cleaned thoroughly. After having this done, they have not had any violations of that parameter. They have fulfilled the requirements of the Administrative Compliance Order. A copy is attached with this letter.

Warren Unilube
915 East Jefferson

This facility was put under an Administrative Compliance Order as well. They fulfilled the requirements of the Administrative Compliance Order. All the documentation is attached to this letter.

Stateside Steel and Wire
304 Wyanoke Road

This is an ongoing issue and will be addressed after the inspection in September.

4) The following items were noted during the Industrial User Inspection of Quala Services, LLC:

- a. Sampling location is suitable for representative sampling, but may not provide adequate protection against tampering.

The sampling location is able to be locked down when the automatic sampler is in place. Other times it remains unlocked.

- b. Facility personnel were not familiar with pretreatment monitoring requirements and relationship with POTW staff appeared strained.

I have talked to higher management several times about this issue. They inform me that all personnel are trained and they believe that the training provided is efficient. Not only does this address the wash rack personnel but I believe also management that is hired. I have stressed the importance of this but I feel that this department is not in the position to tell them who they can or cannot hire. Also, the education level in this area of the state could possibly be a reason as well.

- c. There was a residue on the side of the outdoor wastewater holding tank indicating a recent overfill/overflow. Additionally, the secondary containment for the outdoor holding tank contained visibly contaminated water.

This has been corrected.

- d. There was a small leak from one of the secondary containment drain valves that had been covered with a plastic bag.

This has been corrected.

Also, when Inspector Brent Walker was here, he and I had a conversation in which when discussed several issues. The discussion was of a personal nature and will not be addressed in this response.

I hope this addresses all the issues sufficiently and this department will strive to improve on them as well.

Sincerely,

A handwritten signature in cursive script that reads "Denise Bosnick". The signature is written in black ink and is positioned above the printed name and title.

Denise Bosnick
Director Environmental Quality



WEST MEMPHIS UTILITY COMMISSION

604 East Cooper P O Box 1868

West Memphis, AR 72301

Phone: 870-735-3355 Fax: 870-732-7623

September 23, 2015

Jerrell Marby
Quala
400 Mound City Road
West Memphis, Arkansas 72303

Re: Violation

Dear Mr. Marby,

This is to notify you of the following violation from a sample taken at your facility on September 1-2, 2015.

Copper result was 0.948 mg/L with the limit begin 0.84 mg/L

I am required to re-test within thirty (30) days to assure that you are in compliance.

This is the eighth sample to be in violation for Copper this year. In the response letter that I received from you dated April 20, 2015, you stated that the company was working with a wastewater consultant and in the process of ordering new chemicals to use in the treatment of Copper. If this is the case, it appears that this is not sufficient to keep this from begin a reoccurring issue.

The issue to address is the continuous violation of Quala's Industrial Waste Discharge Permit. Quala's Industrial Waste Discharge Permit 26-Part I-Effluent Limitations (3) Process wastewater per 40 CFR 442.15 pretreatment standards established a maximum limit for Copper of 0.084 mg/L.

Also, according to the City of West Memphis Sewer Use Ordinance 2187-Section 4.2-Individual Wastewater Discharge Permit Requirement-(c).

Any violation of the terms and conditions of an individual Wastewater Discharge Permit shall be deemed a violation of this Ordinance and subjects the Wastewater Discharge Permittee to sanctions set out in Sections 10-12 of this Ordinance. Obtaining an individual Wastewater Discharge Permit does not relieve a permittee of its obligation to comply with all Federal and State Pretreatment Standards or Requirements or with any other requirements of Federal, State, and local law.

Therefore, according to Sewer Use Ordinance 2187, Section 10 Administrative Enforcement Remedies, Quala will now be put under a Compliance Order.

Section 10 (10.4): Compliance Orders

When the Director finds that a User has violated, or continues to violate, any provision of this Ordinance, an individual Wastewater Discharge Permit, or order issued hereunder, or any other Pretreatment Standard or Requirement, the Director may issue an order to the User responsible for the discharge directing that the User come into compliance within a specified time. If the User does not come into compliance within the time provided, sewer service may be discontinued unless adequate treatment facilities, devices, or other related appurtenances are installed and properly operated. Compliance orders also may contain other requirements to address the

noncompliance, including additional self-monitoring and management practices designed to minimize the amount of pollutants discharged to the sewer. A compliance order may not extend the deadline for compliance established for a Pretreatment Standards or Requirement, nor does a compliance order relieve the User of liability for any violation, including any continuing violation. Issuance of a compliance order shall not be a bar against, or prerequisite for, taking any other action against the User.

Details and information on the Compliance Order will be addressed in another document.

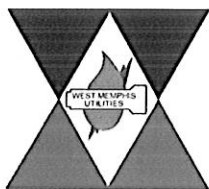
West Memphis Utility will do additional sampling other than the two monthly samples for at least the next thirty (30) days. Quala may be fined \$1000.00 per day per violation according to your Industrial Waste Discharge Permit and the City of West Memphis Sewer Use Ordinance 2187.

If you have any questions, please do not hesitate call me at (870) 702-5141 or e-mail me at dbosnick@citywm.com

Sincerely,

A handwritten signature in cursive script that reads "Denise Bosnick".

Denise Bosnick
Director Environmental Quality



WEST MEMPHIS UTILITY COMMISSION
West Memphis, AR 72301

Administrative Compliance Order

In the Matter of

Quala
400 Mound City Road
West Memphis, Arkansas 72301

Legal Authority

The following findings are made and this Compliance Order issued pursuant to the authority vested in the Director of Environmental Quality of West Memphis Utility under Section 10.4 of the City's Sewer Use Ordinance 2187. This Compliance Order is based on findings of violation of the conditions of the Industrial Waste Discharge Permit issued under Section 5 of the City's Sewer Use Ordinance 2187.

Findings

Quala, Inc., (hereafter "Quala") discharges nondomestic wastewater containing pollutants into the sanitary sewer system of the City of West Memphis (hereafter, "City").

Quala was issued an Industrial Waste Discharge Permit on June 1, 2014, which contains prohibitions, restrictions, and other limitations on the quality of the wastewater it discharges to the sanitary sewer.

Pursuant to the ordinance and the above-referenced permit, data is routinely collected or submitted on the compliance status of Quala.

This data shows that Quala has violated its Industrial Waste Discharge Permit and/or City of West Memphis Sewer Use Ordinance 2187 in the following manner:

Part I-Effluent Limitations-Copper. Limit for Copper is Federal Categorical Pretreatment Standard for Transportation Equipment Cleaning (40 CFR 442.15). Limit is 0.84mg/L Below is a list of dates and the readings.

February 2-3, 2015-re-test for February	33.3 mg/L
February 3-4, 2015	34.0 mg/L
March 9-10, 2015	1.48 mg/L
April 8-9, 2015 re-test for March	0.896 mg/L
April 7-8, 2015	2.92 mg/L
April 14-15, 2015	2.86 mg/L
April 16-17, 2015 retest for April	2.29 mg/L
July 13-14, 2015	1.82 mg/L
August 4-5, 2015	1.01 mg/L
September 1-2, 2015	0.948 mg/L

Order

Therefore, based on the above findings, Quala is hereby ordered to:

Within thirty (30) days submit a detailed plan to bring this facility in compliance. The detailed plan should include if necessary the installation of additional equipment to adequately treat Quala's wastewater to a level which will comply with its Industrial Waste Discharge Permit and the City of West Memphis Sewer Use Ordinance.

Quala should install a flow meter as part of the installation of additional equipment. This equipment needs to be installed on the discharge line to the City. Additionally, a locking system is required to be installed on the discharge side of the facility.

No later than ninety (90) days start installing additional equipment.

Also within thirty (30) days as part of this Consent Order, Quala shall submit a Pollution Management Plan. Quala still however will have to meet the parameter and their limits that are addressed in their Industrial Waste Discharge Permit. The following information should be addressed in the plan:

Description of the operation at the facility
Provisions for identifying cargos
Provisions for refusal of cargo
Provisions for Heel Management
Provisions for Pre-rinsed or Pre-steamed Management
Material Inventory, Handling and Storage
Provisions for Recycling and Reuse of Cleaning Agents
Provisions for minimization of Toxic Cleaning Agents
Information on the volumes, content and chemical characteristics of cleaning agents used in cleaning or brightening operation
Provisions for off-site treatment or disposal
Provisions for maintaining appropriate records of Heel Management Procedures, Pre-rinse/Pre-steam Management Procedures, Cleaning Agent Management Procedures, Operator Training and proper operation and maintenance of any pre-treatment system.

Also, included with the above information, a detailed schematic diagram showing the flow of the process wastewater.

This order does not constitute a waiver of the Industrial Waste Discharge Permit which remains in full force and effect. The Director of Environmental Quality reserves the right to seek any and all remedies available under the City of West Memphis Sewer Use Ordinance.

Failure to comply with the requirements of this order shall constitute a further violation of the City of West Memphis Sewer Use Ordinance and may subject Quala to civil or criminal penalties or such other appropriate enforcement action as may be appropriate.

This order, entered 23rd day of September, 2015, shall be effective upon receipt by Quala.

Denise Bosnick
Director Environmental Quality
West Memphis Utility
604 East Cooper
P.O. Box 1868
West Memphis, Arkansas 72303



Sustainable Container Solutions

October 22, 2015

West Memphis Utility Commission
ATTN: Denise Bosnick
Director of Environmental Quality
604 East Cooper
West Memphis, AR 72301

RE: Administrative Compliance Order
Industrial Waste Discharge Permit No. 26

Quala Services, LLC "Quala" received the letter from your office dated September 23, 2015, notifying us of a Copper violation from the September 2015 sampling event.

Additionally, your letter issued a Compliance Order requiring the following action items:

- 1) Within thirty (30) days submit a detailed plan to bring the facility in compliance. The detailed plan should include if necessary the installation of additional equipment to adequately treat Quala's wastewater to a level which will comply with its Industrial Waste Discharge Permit and the City of West Memphis Sewer on the discharge side of the facility. ATTACHED
- 2) Quala should install a flow meter as part of the installation of additional equipment. This equipment needs to be installed on the discharge line to the City. Additionally, a locking system is required to be installed on the discharge side of the facility. No later than ninety (90) days start installing the additional equipment.

Response to Item #2:

Quala management will work with your office to ensure that a locking system is installed that satisfies your requirements by the time frame agreed upon.

- 3) Also within thirty (30) days as part of this Consent Order, Quala shall submit a Pollution Management Plan. Also included with the PMP, a detailed diagram showing the flow of the process wastewater. ATTACHED

RE: Administrative Compliance Order
Industrial Waste Discharge Permit No. 26

Quala believes that the Copper limit of 0.084 mg/l was typed incorrectly on the permit and should be 0.84 mg/l. If you have any questions, please call (870) 732-2255 or Chuck Boyd at (423) 842-1488.

Sincerely,



Jerrell Marby
Facility Manager

cc: Chuck Boyd
Bob Fallis

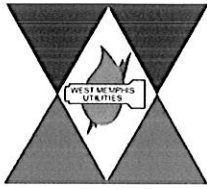
Detailed Plan of Action:

Quala has completed the following actions after receipt of the Administrative Compliance Order:

- 1) The facility identified and stopped cleaning a Product called ACQ on 8-20-15 that contains copper.
- 2) The facility cleaned out all the sludge from the drains on 9-30-15.
- 3) The facility cleaned out all the sludge from the pits on 10-1-15.
- 4) The facility cleaned out all of the sludge from the Equalization Tank the first week of September 2015.

Quala will perform the following tasks to ensure that the wastewater discharged from the facility is within the permit limits for Copper:

- 1) The facility will have at least one extra drum of the Chemical used specifically for treating Copper.
- 2) The facility will have at least one extra Copper test kit to ensure enough supply.
- 3) The facility will pull one sample per week out of the DAF to spot check the field Copper kit.



WEST MEMPHIS UTILITY COMMISSION
604 East Cooper P O Box 1868
West Memphis, AR 72301
Phone: 870-735-3355 Fax: 870-732-7623

June 11, 2015

Mr. Patrick McCloskey
EHS Manager
Warren Unilube, Inc.
P.O. Box 2048
915 East Jefferson
West Memphis, Arkansas 72303

Re: Spill of May 27, 2015

Dear Mr. McCloskey:

On Thursday May 28, 2015, you notified me of a spill at the Warren Unilube facility on May 27, 2015, between the hours of 5:00 pm and 9:00 pm. On inspection of Pump Station 8, located at 610 East Jefferson, the wet well was found to be covered with an oil based product. I immediately checked with the Wastewater Treatment Plant, had them to divert the flow to our equalization basin and contacted Jim's Tank Service to clean the wet well of the station.

This has been a reoccurring problem with Warren Unilube's facility. This will be the fifth spill that we have had to address, and the second spill within the past five months.

The first issue to address is the violation of Warren Unilube's Industrial Waste Discharge Permit. According to the Industrial Waste Discharge Permit Part IV-Condition of Permit 3, 4:

3) Warren Unilube is required to have an Accidental Discharge/Slug Discharge Control Plan. This Plan shall address, at a minimum the following:

Description of discharge practices, including non-routine batch discharges;

Description of stored chemical;
Procedures for immediately notifying West Memphis Utility of any accidental or slug discharge.

Procedures to prevent adverse impact from any accidental or slug discharge. Such procedures included but not limited to inspection and maintenance of storage areas, Handling and transfer of material, loading and unloading operations, control of plant site runoff, worker training, building of containment structures or equipment, measures for containing toxic organic pollutants, including solvents, and/or measures and equipment for emergency response.

4) Warren Unilube, Inc. shall notify the Director of Environmental Quality immediately upon the occurrence of an accidental discharge of substances prohibited by Ordinance

2187, Section 2, or any slug loads or spills that may enter the collection system. West Memphis Utility should be notified by telephone at (870) 735-3355. The notification shall include location of the discharge, date and time thereof, type of waste, including concentration and volume, and corrective actions taken. The user's notification of accidental releases in accordance with this section does not relieve it of other reporting requirements that arise under local, state or federal laws.

Within five (5) days following such discharge, the user shall, unless waived by the Director of Environmental Quality, submit a detailed report describing the cause(s) of the discharge and the measures to be taken by the user to prevent similar future occurrences. Such notification shall not relieve the user of any expenses, loss, damage, or other liability which might be incurred as a result of damage to the POTW, natural resources, or any other damage to person or property; no shall such notification relieve the user of any fines, penalties, or other liability which may be imposed pursuant to Ordinance 2187.

This time unlike the last, I was notified of the occurrence, however, I do not believe that Warren Unilube has put sufficient procedures in place to prevent an adverse impact on West Memphis Utility wastewater collection and treatment systems. This is apparent by the facility having two spills within the past five (5) months.

The next issue to be addressed is the cost incurred by West Memphis Utility for the clean-up of pump station 8 and the analytical cost. I have enclosed a copy of the invoices from Jim's Tank Service for clean-up and invoices from Environmental Testing and Consulting for the analytical cost. The total amount of the clean-up costs is \$10,344.32, which amount, together with the administrative fines assessed below, should be made payable to the West Memphis Utilities.

The next issue to address is Administrative Fines:

Ordinance 2187, Section 10 (10.6) provides:

Administrative Fines

When the Director finds that a User has violated, or continues to violate, any provision of this Ordinance, an individual Wastewater Discharge Permit, or order issued hereunder, or any other Pretreatment Standard or Requirement, the Director may fine such User in an amount not to exceed \$1,000.00. Such fines shall be assessed on a per-violation, per-day basis. In the case of monthly or other long-term average discharge limits, fines shall be assessed for each day during the period of violation.

Users desiring to dispute such fines must file a written request for the Director to reconsider the fine along with full payment of the fine amount within ten (10) days of being notified of the fine. Where a request has merit, The Director may convene a hearing on the matter. In the event the User's request is granted, the payment shall be returned to the User. The Director may add the costs of preparing administrative enforcement actions, such as notices and orders, to the fine.

Issuance or pursuit of an administrative fine shall not be a bar against, or a prerequisite for, taking any other action against the User.

Article II, General Sewer Use Requirements of Ordinance 2187 provides, in part:

Section 2.1: Prohibited Discharge Standards:

(A): General Prohibitions. No User shall introduce or cause to be introduced into the POTW and pollutant or wastewater which causes Pass Through or Interference. These general prohibitions apply to all Users of the POTW whether or not they are subject to Categorical Pretreatment Standards or any other National, State, or local Pretreatment Standards or Requirements.

(B): Specific Prohibitions. No User shall introduce or cause to be introduced into the POTW the following pollutants, substances, or wastewater:

...
(5) Wastewater which will inhibit biological activity in the treatment plant resulting in Interference, but in no case wastewater which causes the temperature at the introduction into the treatment plant to exceed 104 degrees F (40 degrees C);

(6) Petroleum oil, nonbiodegradable cutting oil, or products of mineral oil origin, in amounts that will cause Interference or Pass Through;

Warren Unilube is assessed an administrative fine of \$1,000.00 per violation for violating Sections 2.1(A), 2.1(B)(5), and 2.1(B)(6) for a total administrative fine of \$3,000.00.

The next issue to address is that this is the fifth (5th) time a problem that has occurred. This time, as well as the time before, the control of the Oil and Water Separator has been in question. Efforts to resolve the problem from the incident in December have proven to be insufficient. The control of the Oil and Water Separator continues to be in question as well as the procedures. These procedures are not sufficient to keep this issue from reoccurring. As was stated in addressing the December issue, the next time that this occurred, Warren Unilube will either have to install additional equipment for treatment or be in jeopardy of having its Industrial Waste Discharge Permit revoked.

Therefore, according to Ordinance 2187 Section 10 Administrative Enforcement Remedies Warren Unilube will now be put under a Compliance Order.

Section 10 (10.4): Compliance Orders

When the Director finds that a User has violated, or continues to violate, any provision of this Ordinance, an individual Wastewater Discharge Permit, or order issued hereunder, or any other Pretreatment Standard or Requirement, the Director may issue an order to the User responsible for the discharge directing that the User come into compliance within a specified time. If the User does not come into compliance within the time provided, sewer service may be discontinued unless adequate treatment facilities, devices, or other related appurtenances are installed and properly operated.

Compliance orders also may contain other requirements to address the noncompliance, including additional self-monitoring and management practices designed to minimize the amount of pollutants discharged to the sewer. A compliance order may not extend the deadline for compliance established for a Pretreatment Standards or Requirement, nor does a compliance order relieve the User of liability for any violation, including any continuing violation. Issuance of a compliance order shall not be a bar against, or a

Mr. Patrick McCloskey

June 11, 2015

Page 4

prerequisite for, taking any other action against the User.

Details and information on the Compliance Order will be addressed in another document. The total amount of the administrative fine and repayment for the clean-up and analytical cost (\$13,344.32) will need to be paid within fifteen (15) days from the date of this letter. If payment is not received within this time period or arrangements made, utility service can be terminated.

If you have any questions, please contact my office at (870) 702-5141. Your prompt attention is appreciated.

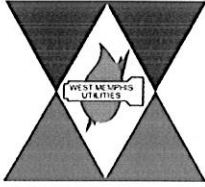
Sincerely,

A handwritten signature in cursive script that reads "Denise Bosnick".

Denise Bosnick
Director Environmental Quality

Enclosures

cc: David Peeples
City Attorney



WEST MEMPHIS UTILITY COMMISSION
West Memphis, AR 72301

Administrative Compliance Order

In the Matter of

Warren Unilube, Inc.
915 East Jefferson
West Memphis, Arkansas 72301

Legal Authority

The following findings are made and this Compliance Order issued pursuant to the authority vested in the Director of Environmental Quality of West Memphis Utility under Section 10.4 of the City's Sewer Use Ordinance 2187. This Compliance Order is based on findings of violation of the conditions of the Industrial Waste Discharge Permit issued under Section 5 of the City's Sewer Use Ordinance 2187.

Findings

Warren Unilube, Inc., (hereafter "Warren Unilube") discharges nondomestic wastewater containing pollutants into the sanitary sewer system of the City of West Memphis (hereafter, "City").

Warren Unilube was issued an Industrial Waste Discharge Permit on June 1, 2011, which contains prohibitions, restrictions, and other limitations on the quality of the wastewater it discharges to the sanitary sewer.

Pursuant to the ordinance and the above-referenced permit, data is routinely collected or submitted on the compliance status of Warren Unilube.

This data shows that Warren Unilube has violated its Industrial Waste Discharge Permit and/or City of West Memphis Sewer Use Ordinance 2187 in the following manner:

Part IV-Condition of Permit Number 3, 4-Accidental Discharge/Slug Discharge

Section 2.1-Prohibited Discharge Standards: Section 2.1 (A)-General Prohibitions and 2.1 (B)-Specific Prohibitions, (5), (6)

Order

Therefore, based on the above findings, Warren Unilube is hereby ordered to:

Within sixty (60) days submit a detailed plan to bring this facility in compliance. The detailed plan should include the installation of additional equipment to adequately treat Warren Unilube's wastewater to a level which will comply with its Industrial Waste Discharge Permit and the City

of West Memphis Sewer Use Ordinance.

Flow Meter and pH equipment should be part of the installation of additional equipment. This equipment needs to be installed on the discharge line to the City. Additionally, a locking system is required to be installed on the Oil and Water Separator on the Jefferson side of the facility.

No later than one hundred-twenty (120) days start installing additional equipment.

This order does not constitute a waiver of the Industrial Waste Discharge Permit which remains in full force and effect. The Director of Environmental Quality reserves the right to seek any and all remedies available under the City of West Memphis Sewer Use Ordinance.

Failure to comply with the requirements of this order shall constitute a further violation of the City of West Memphis Sewer Use Ordinance and may subject Warren Unilube to civil or criminal penalties or such other appropriate enforcement action as may be appropriate.

This order, entered 11th day of June, 2015, shall be effective upon receipt by Warren Unilube.

Denise Bosnick
Director Environmental Quality
West Memphis Utility
604 East Cooper
P.O. Box 1868
West Memphis, Arkansas 72303



WARREN[®] Unilube Inc.

P.O. Box 2048
West Memphis, AR 72303-2048
870-735-1514 or 800-428-9284



August 10, 2015

Ms. Denise Bosnick
Director Environmental Quality
West Memphis Utility Commission
604 East Cooper
P.O. Box 1868
West Memphis, AR 72301

Dear Denise,

Here is Warren Unilube's detail plan as a response to your Administrative Compliance Order of 6/11/2015. The plan is as follows:

- 1) New Oil Water Separator elements for the interior of the OWS are on order. To be changed within in 30 days.
- 2) New pH Meter – Van London Eutech Series 200 with 4' probe or equivalent to be located on side of OWS with probe at top – to be monitored every 4 hours. Work to be completed within 45 days.
- 3) Flow Meter – 10" OD Badger Flow Meter or equivalent to be located on the discharge line to city monitored every morning before release. Work to be completed within 45 days.
- 4) Cut-off Valve - 10" OD Milwaukee cut off valve or equivalent to be located on the discharge line to city – to be locked out in off position when no release. Work to be completed within 45 days.

These enhancements to our Oil Water Separator will be made to ensure that all releases remain within permit limits and to avoid inadvertent releases to city.

If you need any further information, please call me at 870-400-3028 (O) or 870-635-3391 (C).

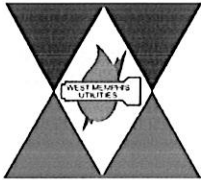
Sincerely yours,

Patrick McCloskey
Environmental, Health and Safety Manager
Warren Unilube, Inc.

Corporate Office

P.O. Box 1507 • 2340 US 301 North
Dunn, NC 28334 • 910-892-6456

Benton, AL 36785 • San Antonio, TX 78210 • Marion, IL 62959 • Johnston, PA 15909 • West Memphis, AR 72301



WEST MEMPHIS UTILITY COMMISSION

P O Box 1868 604 East Cooper
Phone: 870-735-3355 Fax: 870-732-7623
West Memphis, AR 72301

October 13, 2015

Mr. Bill Singleton
Vice President and
General Counsel
Warren Unilube, Inc.
P.O. Box 2048
915 East Jefferson
West Memphis, Arkansas 72303

Re: Compliance Order-June 11, 2015

Dear Mr. Singleton,

This letter is to notify you of a violation of the Administrative Compliance Order that West Memphis Utility and Warren Unilube, Inc. entered into on June 11, 2015. As part of the compliance order, Warren Unilube was to start installing equipment within one hundred-twenty (120) days of the date of the order.

In reference to Warren Unilube's response dated August 10, 2015 from Patrick McCloskey all the work was to be completed within forty-five (45) days. Both times have come and gone and I have not heard from Warren Unilube or seen any progress in having this equipment installed.

As stated in the Compliance Order, failure to comply with the requirements of this order shall constitute a further violation of the City of West Memphis Sewer Use Ordinance and may subject Warren Unilube to civil and criminal penalties or other appropriate enforcement action.

According to the City of West Memphis Sewer Use Ordinance 2187 Section 10 (10.6) Administrative Fines:

When the Director finds that a User has violated, or continues to violate, any provision of this Ordinance, an individual Wastewater Discharge Permit, or order issued hereunder, or any other Pretreatment Standard or Requirement, the Director may fine such User in an amount not to exceed \$1,000.00 Such fines shall be assessed on a per-violation, per-day basis. In the case of monthly or other long-term average discharge limits, fines shall be assessed for each day during the period of violation

Therefore starting Monday October 19, 2015, Warren Unilube will be assessed a fine of \$1,000.00 per day until all of the equipment is installed and operating properly.

Issuance or pursuit of an administrative fine shall not be a bar against, or a prerequisite for, taking any other action against the User.

If you have any questions, please contact me at (870) 702-5141, or email at dbosnick@citywm.com.

Sincerely,

A handwritten signature in cursive script that reads "Denise Bosnick".

Denise Bosnick
Director Environmental Quality



WEST MEMPHIS UTILITY COMMISSION

P O Box 1868 604 East Cooper
Phone: 870-735-3355 Fax: 870-732-7623
West Memphis, AR 72301

October 27, 2015

Mr. Bill Singleton
Vice President and
General Counsel
Warren Unilube, Inc.
P.O. Box 2048
915 East Jefferson
West Memphis, Arkansas 72303

Re: Compliance Order-June 11, 2015

Dear Mr. Singleton,

I wrote a letter to you dated October 13, 2015 addressing the violation of the Administrative Compliance Order that Warren Unilube and the City of West Memphis entered into on June 11, 2015. Administrative fines of \$1,000.00 per day were to start on October 19, 2015.

You called and spoke to me about this issue on October 16, 2015 and also addressed an email to me about our discussion. In the email you addressed the following:

New media panels for the oil and water separator were purchased and had been received but not yet been installed. Also that you hoped that this could be accomplished the week of October 19th.

As to the flowmeters, they were going to have to be reordered and that they would be installed upon receipt. Also that you would let me know the estimated time of arrival from the manufacturer.

I had not heard or received any correspondence from you until the morning of October 27, 2015. That e-mail informed me that the flowmeter had been received and that they will be installed once the weather permits.

I also need to address the fact that the Administrative Compliance Order also addressed the installation of a pH meter and a locking system to be installed on the discharge side of the Jefferson street oil and water separator. This issue has not been addressed at this time.

Therefore, the Administrative Fines of \$1,000.00 will begin on Wednesday October 28, 2015 until all equipment has properly been installed.

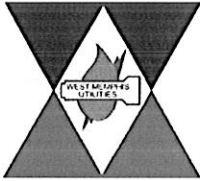
If you have any questions, please contact me as soon as possible at (870) 702-5141 or email me at dbosnick@citywm.com

Sincerely,

Denise Bosnick

Denise Bosnick

Director Environmental Quality



WEST MEMPHIS UTILITY COMMISSION

P O Box 1868 604 East Cooper
Phone: 870-735-3355 Fax: 870-732-7623
West Memphis, AR 72301

December 8, 2015

Mr. Bill Singleton
Vice President and
General Counsel
Warren Unilube, Inc.
P.O. Box 2048
915 East Jefferson
West Memphis, Arkansas 72303

Re: Administrative Fines for Violation of Compliance Order-June 11, 2015

Dear Mr. Singleton,

Enclosed is a statement for the Administrative Fines for the violation of the Administrative Compliance Order entered into June 11, 2015. The fines are in the amount of seven thousand dollars (\$7000.00). This amounts to one thousand dollars (\$1000.00) per day from October 28, 2015 to November 3, 2015.

As you well know the fines were original supposed to start on October 19, 2015 but after our conversation on October 16, 2015, I gave Warren Unilube and extra week to figure out what was going on since Patrick McCloskey had left his position with the company.

I appreciate all Warren Unilube did to accomplish the work in a timely manner and its look like everything that was put into place is working well at this time.

If you have any questions, please do not hesitate to give me a call at (870) 702-5141.

Sincerely,

A handwritten signature in cursive script that reads "Denise Bosnick".

Denise Bosnick
Director Environmental Quality



WEST MEMPHIS UTILITY COMMISSION

P O Box 1868 604 East Cooper
Phone: 870-735-3355 Fax: 870-732-7623
West Memphis, AR 72301

May 20, 2016

Lance Berryhill
Wastewater Solutions, LLC
408 Mound City Road
West Memphis, Arkansas 72301

Re: Violations

Dear Mr. Berryhill,

This is to notify you that Wastewater Solutions is in Significant Non Compliance due to numerous violations of your effluent limits.

I am required to retest within thirty (30) days to assure that you are in compliance. I have been retesting as required and these samples have also been out of compliance.

The issue to address is the continuous violation of Wastewater Solution Industrial Waste Discharge Permit 28 –Part I- Effluent Limitations (3) Process wastewater per 40 CFR 437.47 (b) pretreatment standards.

There has been violations on this parameter since August 2015. The limit for p-Cresol is 0.698 mg/L and the Monthly Average is 0.205 mg/L. The following is a list of dates and results:

August 4-5, 2015	0.748mg/L	Violation of Daily Maximum and Monthly Average
August 18-19, 2015	0.342 mg/L	Violation of Monthly Average
September 1-2, 2015	0.681 mg/L	Violation of Monthly Average
November 3-4, 2015	0.328 mg/L	Violation of Monthly Average
December 8-9, 2015	5.96 mg/L	Violation of Daily Maximum and Monthly Average
February 3-4, 2016	0.958 mg/L	Violation of Daily Maximum and Monthly Average
February 9-10, 2016	3.89 mg/L	Violation of Daily Maximum and Monthly Average
February 17-18, 2016	3.00	Retest-Violation of Daily Maximum and Monthly Average
February 29- March 1, 2016	4.99 mg/L	Retest-Violation of Daily Maximum and Monthly Average
March 1-2, 2016	4.41 mg/L	Violation of Daily Maximum and Monthly Average
March 3-4, 2016	4.20 mg/L	Retest-Violation of daily Maximum and Monthly Average
March 15-16, 2016	1.13 mg/L	Retest-Violation of Daily maximum and Monthly Average
March 16, 2016 (grab)	1.15 mg/l	Retest-Violation of Daily Maximum and Monthly Average
March 16-17, 2016	0.979 mg/L	Violation of Daily Maximum and Monthly Average
March 17, 2016 (grab)	1.84 mg/L	Retest-Violation of Daily maximum and Monthly Average
March 17-18, 2016	0.737 mg/L	Retest-Violation of Daily Maximum and Monthly Average
March 20-21, 2016	0.605 mg/L	Retest-Violation of Monthly Average
March 28, 2016 (grab)	0.849 mg/L	Retest-Violation of Daily Maximum and Monthly Average
April 6-7, 2016	0.768 mg/L	Violation of Daily Maximum and Monthly Average

April 11, 2016 (grab)	0.318 mg/l	Retest-Violation of Monthly Average
April 13, 2016 (Raw Product) (grab) results were	<5.10 ug/L	
April 13, 2016 (grab)	0.396 mg/l	Violation of Monthly Average
April 13-14, 2016	0.307 mg/L	Violation of Monthly Average
April 14, 2016 (Raw Product) (grab) results were	<25.5 ug/L	
April 14, 2016 (grab)	0.0835 mg/L	Retest-Violation of Daily Maximum and Monthly Average
April 14-15, 2016	0.115 mg	
April 20, 2016 (grab)	0.216 mg/l	Retest-Violation of Monthly Average
April 21, 2016 (grab)	0.574	Retest-Violation of Monthly Average
April 27, 2016 (Clearwater tank)	0.136 mg/l	
April 27, 2016 (P2 Tank)	0.265 mg/L	Violation of Monthly Average
April 27, 2016 (DAF)	1.2 mg/l	Violation of Daily Maximum and Monthly Average
May 6, 2016 (Raw Product) (grab) results were	<51.0 ug/L	
May 6, 2016 (P2 Tank)	0.607 mg/L	Violation of Monthly Average
May 6, 2016 (Clarifier)	0.614 mg/L	Violation of Monthly Average

Also, according to the City of West Memphis Sewer Use Ordinance 2187-Section 4.2 Individual Wastewater Discharge Permit requirements-(c)

Any violation of the terms and conditions of an individual Wastewater Discharge Permit shall be deemed a violation of the Ordinance and subjects the Wastewater Discharge Permittee to sanctions set out in Section 10-12 of the Ordinance. Obtaining an individual Wastewater Discharge Permit does not relieve a permittee of its obligation to comply with all Federal and State Pretreatment Standards or Requirements or with any other requirements of Federal, State and local law.

Therefore, according to Sewer Use Ordinance 2187, Section 10 Administrative Enforcement Remedies, Wastewater Solutions will now be put under a Compliance Order.

Section 10 (10.4): Compliance Orders

When the Director finds that a user has violated, or continues to violate, any provision of this Ordinance, and individual Wastewater Discharge Permit. Or order issued hereunder, or any other Pretreatment Standard or Requirement, the Director may issue an order to the User responsible for the discharge directing that the User come into compliance within a specified time. If the User does not come into compliance within the time provided, sewer service may be discontinued unless adequate treatment facilities, devices, or other related appurtenances are installed and properly operated. Compliance orders also may contain other requirements to address the noncompliance, including additional self-monitoring and management practices designed to minimize the amount of pollutants discharged to the sewer. A compliance order may not extend the deadline for compliance established for a Pretreatment Standard or Requirement, nor does a compliance order relive the User of liability for any violation, including any continuing violation. Issuance of a compliance order shall not be a bar against, or prerequisite for, taking any other action against the User.

Details and information on the Compliance Order will be addressed in another document.

West Memphis Utility will continue to do additional sampling other than the two monthly samples until Wastewater Solutions is in compliance with the p-cresol limit. Wastewater Solutions may be fined \$1000.00 per day per violation according to your Industrial Waste Discharge Permit and the City of West Memphis Sewer Use Ordinance 2187.

If you have any questions, please do not hesitate to call me at (870) 702-5141 or e-mail me at dbosnick@citywm.com

Sincerely,

A handwritten signature in cursive script that reads "Denise Bosnick".

Denise Bosnick
Director Environmental Quality

Cc: Roger Woolbright



WEST MEMPHIS UTILITY COMMISSION

P O Box 1868 604 East Cooper
Phone: 870-735-3355 Fax: 870-732-7623
West Memphis, AR 72301

Administrative Compliance Order

In the Matter of

Wastewater Solution
408 Mound City Road
West Memphis, Arkansas 72301

Legal Authority

The following findings are made and this Compliance Order issued pursuant to the authority vested in the Director of Environmental Quality of West Memphis Utility under Section 10.4 of the City's Sewer Use Ordinance 2187. This Compliance Order is based on findings of violation of the conditions of the Industrial Waste Discharge Permit issued under Section 5 of the City's Sewer Use Ordinance 2187.

Findings

Wastewater Solution discharges nondomestic wastewater containing pollutants into the sanitary sewer system of the City of West Memphis (hereafter, "City").

Wastewater Solution was issued an Industrial Waste Discharge Permit on September 1, 2014 which contains prohibitions, restrictions, and other limitations on the quality of wastewater it discharges to the sanitary sewer.

Pursuant to the ordinance and the above-referenced permit, data is routinely collected and submitted on the compliance status of Wastewater Solution.

The data shows that Wastewater Solution has violated its Industrial Waste Discharge Permit and/or City of West Memphis Sewer Use Ordinance 2187 in the following manner:

Part 1-Effluent Limitations-p-Cresol. Limit for p-Cresol is Federal Categorical Pretreatment Standard for Centralized Waste Treatment (40 CFR 437.47 (b)). Below is a list of dates and results.

August 4-5, 2015	0.748mg/L	Violation of Daily Maximum and Monthly Average
August 18-19, 2015	0.342 mg/L	Violation of Monthly Average
September 1-2, 2015	0.681 mg/L	Violation of Monthly Average
November 3-4, 2015	0.328 mg/L	Violation of Monthly Average
December 8-9, 2015	5.96 mg/L	Violation of Daily Maximum and Monthly Average
February 3-4, 2016	0.958 mg/L	Violation of Daily Maximum and Monthly Average
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March 3-4, 2016	4.20 mg/L	Retest-Violation of daily Maximum and Monthly Average
March 15-16, 2016	1.13 mg/L	Retest-Violation of Daily maximum and Monthly Average

March 16, 2016 (grab)	1.15 mg/l	Retest-Violation of Daily Maximum and Monthly Average
March 16-17, 2016	0.979 mg/L	Violation of Daily Maximum and Monthly Average
March 17, 2016 (grab)	1.84 mg/l	Retest-Violation of Daily maximum and Monthly Average
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March 20-21, 2016	0.605 mg/L	Retest-Violation of Monthly Average
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April 6-7, 2016	0.768 mg/L	Violation of Daily Maximum and Monthly Average
April 11, 2016 (grab)	0.318 mg/l	Retest-Violation of Monthly Average
April 13, 2016 (grab)	<5.10 ug/L	Raw Product
April 13, 2016 (grab)	0.396 mg/l	Violation of Monthly Average
April 13-14, 2016	0.307 mg/L	Violation of Monthly Average
April 14, 2016 (grab)	<25.5 ug/L	Raw Product
April 14, 2016 (grab)	0.0835 mg/L	Retest-Violation of Daily Maximum and Monthly Average
April 14-15, 2016	0.115 mg	
April 20, 2016 (grab)	0.216 mg/l	Retest-Violation of Monthly Average
April 27, 2016 (grab)	0.136 mg/l	Clearwater Tank
April 27, 2016 (grab)	0.265 mg/L	P2 Tank-Violation of Monthly Average
April 27, 2016 (grab)	1.2 mg/l	DAF-Violation of Daily Maximum and Monthly Average
May 6, 2016 (Raw Product) (grab) results were	<51.0 ug/L	
May 6, 2016 (P2 Tank)	0.607 mg/L	Violation of Monthly Average
May 6, 2016 (Clarifier)	0.614 mg/L	Violation of Monthly Average

Order

Therefore, based on the above findings, Wastewater Solution is hereby ordered to:

Within thirty (30) days submit a detailed plan to bring the facility in compliance. The detailed plan should include if necessary the installation of additional equipment to adequately treat Wastewater Solution's wastewater to a level which will comply with its Industrial Waste Discharge Permit and the City of West Memphis Sewer Use Ordinance.

No later than sixty (60) days after the submittal of a detailed plan, start installing additional equipment.

Wastewater Solution shall submit the following:

- List and describe the subcategory wastes being accepted for treatment at the facility;
- List and describe the treatment systems in-place at the facility, modifications to the treatment systems and the conditions under which the systems are operated for the subcategories of wastes accepted for treatment at this facility;
- Provide information and supporting data establishing that these treatment systems will achieve equivalent treatment;
- Describe the procedures it follows to ensure that its treatment systems are well operated and maintained; and
- Explain why the procedures it has adopted will ensure its treatment systems are well operated and maintained.

Also, Wastewater Solution shall submit a Periodic Certification Statement. This statement should certify that the facility is operating its treatment systems to provide equivalent treatment as set forth in the Initial Certification Statement. In the event that the facility has modified its treatment systems, the facility should submit a description of the modified systems and information and supporting data to establish that the modified system will achieve equivalent treatment. The Periodic Certification Statement must be signed by the responsible corporate officer.

Reimburse West Memphis Utility for all additional sampling and analysis that has already been performed in the amount of three thousand six hundred and twenty-five dollars (3625.00) and all other test that will be required to assure the Wastewater Solution is in compliance with their effluent limits.

Also included with the above information, a detailed schematic diagram showing the flow of the process wastewater.

This order does not constitute a waiver of the Industrial Waste Discharge Permit which remains in full force and effect. The Director of Environmental Quality reserves the right to seek any and all remedies available under the City of West Memphis Sewer Use Ordinance.

Failure to comply with the requirements of this order shall constitute a further violation of the City of West Memphis Sewer Use Ordinance and may subject Wastewater Solution to civil or criminal penalties or such other appropriate enforcement action as may be appropriate.

This order, entered 20th day of May, 2016, shall be effective upon receipt by Wastewater Solution

Denise Bosnick
Director Environmental Quality
West Memphis Utility
604 East Cooper
P.O. Box 1868
West Memphis, Arkansas 72303



427 Dacus Rd., Marion, AR 72364 (901) 357-7237

June 17, 2016

Ms. Denise Bosnick
Director Environmental Quality
West Memphis Utilities Commission
604 East Cooper
West Memphis, Arkansas 72301

Re: Administrative Compliance Order

Dear Ms. Bosnick:

Per your letter dated May 20, 2016, I have responded to your Administrative Compliance Order. We have evaluated our waste generators and have identified the potential source of Cresol into our system. ATM Oil Company (ATM) has agreed to change the handling procedures for their customer, which handles spent carbon. The carbon will be loaded directly into to a roll off box and not placed into a mixing area, which would allow it to be in contact with the ATM water. ATM will also check other potential generators that could have waste containing cresol.

Waste Water Solutions (WWS) has also performed a thorough cleaning of the following equipment:

- Truck unloading filter system
- Incoming water storage tanks
- Piping and pumps from the storage tanks
- Oil water separator and media
- Process tanks 1& 2
- DAF
- Rap mix tanks
- Clarifier
- Bag filter system
- Clean water tank

- Discharge Flume

Once all the equipment was cleaned, clean water with a PH of 9 was pumped through the system and a sample from the discharge flume was collected to be analyzed for Cresol.

ATM also agreed to clean their grit chamber, separator and water holding sump. A sample was also collected from the separator and sludge that was removed during the cleaning and will be analyzed for Cresol (see attached). All water that was collected from the cleaning operation was disposed of offsite. WWS's plan to bring the facility into compliance consists of the following tasks:

- Keep sludge from building up in the incoming water storage tanks
- Keep the oil water separator media cleaned
- Collect random samples from ATM Oil Company's waste water streams
- WWS has agreed on terms for purchasing two carbon units
- WWS will install two carbon units into their system for polishing the processed water

1) Our clarifier, needed to have the solids removed to function more efficiently

2) The PH of 7.4 on the water needs to be raised and processed at a PH of 8- 9

3) Our system needs to be operated slower when running this material

WWS is going to have the solids removed from the clarifier on a regular schedule. The PH is going to be checked more frequently in the water leaving the DAF and in the clarifier. I am going to visit another facility in Mississippi on Monday to evaluate the carbon units they are using. This could be a backup option for us in the future.

WWS will continue to work and evaluate our system to correct this problem. Should you have any questions or need additional information please contact me at (901) 494-2329.

Sincerely,

Roger Woolbright, CHMM



427 Dacus Rd., Marlon, AR 72364 (901) 357-7237

Baseline Monitoring Report (BMR)

Company Information:

Waste Water Solutions, LLC
408 Mound City Road
West Memphis, Arkansas 72301

Mailing Address:

427 Dacus Road
Marion, Arkansas 72364

Telephone Number:

901-357-7237

Wastewater Contact Person:

Roger Woolbright – 901-494-2329

Lance Berryhill – 901- 493-5633

Operation Manager:

Roger Woolbright

Owner of the Company:

Lance Berryhill

Receiving Public Owned Treatment Works (POTW):

West Memphis Utility (City of West Memphis)-P.O. Box 1868-604 East Cooper-West
Memphis, Arkansas 72303



427 Dacus Rd., Marion, AR 72364 (901) 357-7237

I. Information Previously Submitted

1. Has a baseline report been previously submitted for this facility?

Yes No

If yes, please provide the date, name and address of agency to which it was submitted.

2. Environmental Permits held by the Company:

A. Centralized Waste Treatment (Multiple Waste streams)

B. Industrial Wastes Discharge Permit #28

3. Production Information

A. Nature of the operation

WWS serves as a pre-treater for industries that can't meet their waste water POTW's standards.

B. Production Rate

WWS operators process water through the system at a rate of 50 – 150 gallons per minute

C. SIC or NAICS codes

1799-99-25, 1389-99-15, 4499-02-01, 4212

D. Process Description

a) The waste water stored in the storage tanks, located inside the building, will be pumped through 150 gallons per minute (GPM) oil water separator. The oil removed from the separator will be collected in an above ground tank outside the building. The solids will be removed from the separator as needed with a vacuum truck and transported to the ATM Oil Company Facility for disposal.

b) The water flowing through the separator will be pumped into a vertical process tank, which will adjust the PH as need, prior to being pumped into the Dissolved Air Flotation System (DAF).



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- c) The DAF will remove additional oil and breakdown the water soluble oil. The emulsified oil will be pumped into the above ground oil tank outside the building.
- d) A coagulant will be injected into the water line and gravity feed into the DAF. This will allow additional retention time for the coagulant to break down the water.
- e) The water, once treated by the DAF will discharge into a tote below the DAF and will be pumped into the bottom of another vertical tank to adjust the PH.
- f) The water will then overflow into the rapid mix tank.
- g) The water will then overflow into the flocculating tank.
- h) The water will then gravity feed into the clarifier, which will allow more retention time for the chemical to work. The solids will fall out and the treated water will then overflow into a holding tank below the DAF. The tank then will be pumped through the bag filters and will pass through the City discharge tank.
- i) The water will then gravity feed from the City discharge tank and into the city's sanitary sewer for disposal.

4. Flow Measurement Information:

Estimated Monthly Gallons – 200,000 gallons/month and manifest volumes are logged and emailed each month to West Memphis Utilities.

II. Concentration of Pollutants in Wastewater:

(See attached permit's limits)

III. Generation of Solid Waste and Disposal Methods:

All sludge is Non-Hazardous and is transported and disposed at ATM Oil Company



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Certification

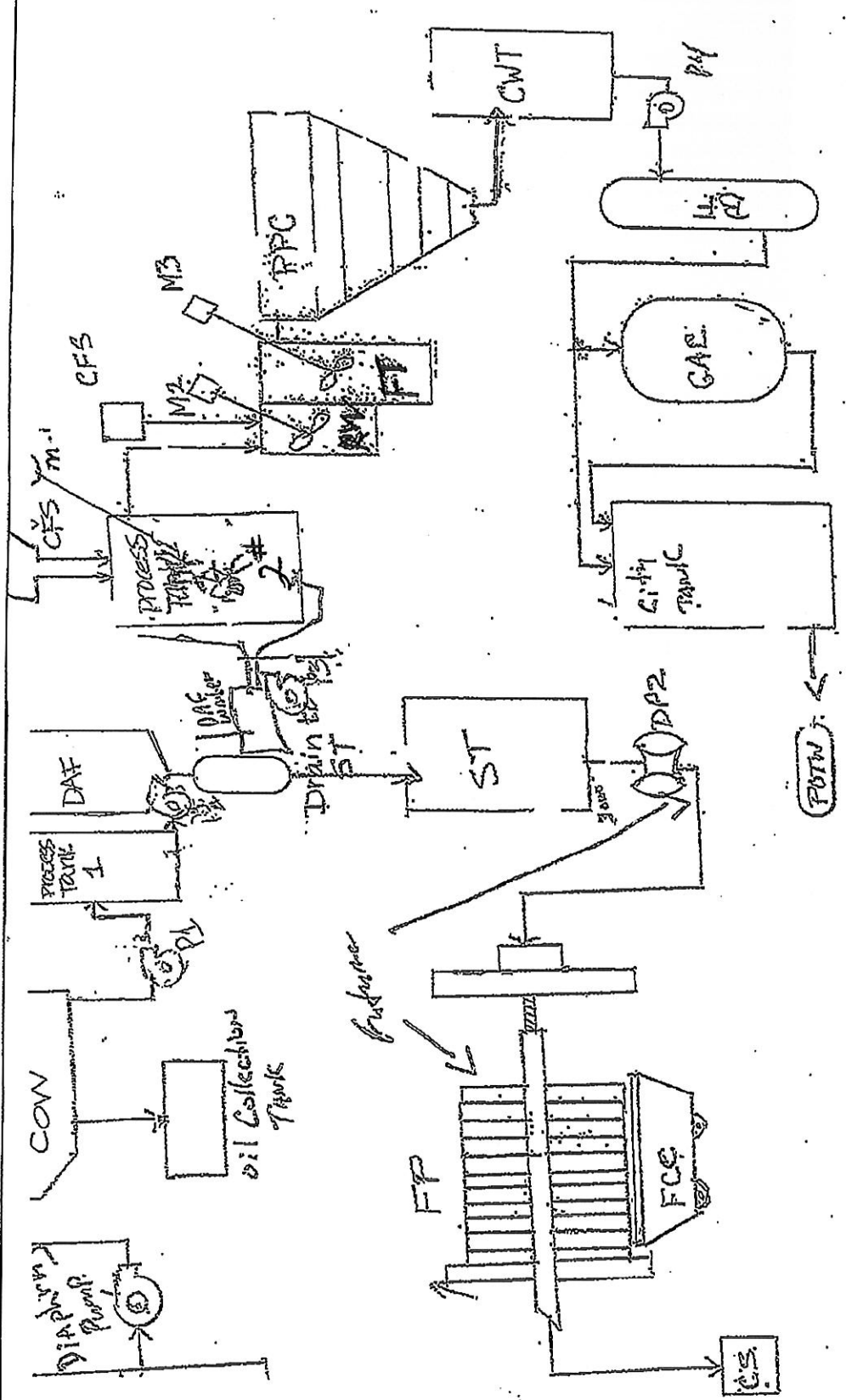
I hereby certify that I have personally examined, and am familiar with, all of the information in this Baseline Monitoring Report, including all attachments. Based on my inquiry of those persons immediately responsible for obtaining the information contained in this report, I believe that the information is true, accurate and complete.

A handwritten signature in black ink, appearing to read "Lance Berryhill", is written over a horizontal line.

Lance Berryhill
Waste Water Solutions, LLC

A handwritten date "6/22/16" is written in black ink above a horizontal line.

Date



- PC - Product Concentrator
 CT - Collection Tank
 P - Centrifugal Pump
 CC - Coalescing Oil water separator
 DAF - Dissolved Air Flotation unit
 CFS - Chemical Feed System
 M - Mixer
 PHT - pH adjust tanks
 RM - Rapid mix tank
 FT - Floculant tank
 PPE - Parallel Plate Clarifier
 CWT - Clear water tank
 DP - Diaphragm Pump
 BF - Bag Filter
 GAC - Granular Activated Carbon Unit
 ST - Settling Tank
 PP - Filter Press
 CCS - Filter residue collection