

May 10, 2017

James W. Sanders, Mayor City of Blytheville 124 West Walnut St. Blytheville, AR 72315

RE: City of Blytheville Wastewater Treatment Plant Inspections

Facility: AFIN: Permit No.:

West 47-00544 AR0022560 & ARR00C337 South 47-00926 AR0022578 & ARR00C338 North 47-00929 AR0022586 & ARR000929

Dear Mr. Sanders:

On March 7 and 8, 2017, I performed Compliance Evaluation, Sanitary Sewer Overflow and Industrial Stormwater Inspections of your three wastewater treatment plants 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 of the attached inspection reports and provide a written response for each violation that was noted. These responses 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. Each 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 May 26, 2017.

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 2 Walter

Water Division

	<u>ADEO</u>		WATER	DIVISION I	NSF	ECTIO	N REPORT		
	ADLQ	AF	IN: 47-00544 PI	ERMIT #: AR0022	2560		DATE: 3/8/2017		
Δ	RKANSAS	CC	OUNTY: 47 Missis	ssippi	PDS	#: 096927	MEDIA: WN		
De	partment of Environmental Quality	GF	S LAT: 35.93485	0 LONG: -89.942	2647 L	OCATION: I	Entrance		
	FACILITY INFORMAT	ION		IN	SPEC	TION INFOR	RMATION		
	E: ytheville - West WWTP ATION:			FACILITY TYPE: 1 - Municipal	5213	TOR ID#: 88 S - State			
	52 NCR 635			facility evaluation ration 1 - Unsatisfacto	ory	Com	non TYPE: npliance Evaluation		
Blytheville				(-)	NTRY TIME: 9:30	EXIT TIME: 16:45	PERMIT EFFECTIVE DATE:		
	RESPONSIBLE OFFIC	CIAL	•	1	0:35	15:10	1/1/2016 PERMIT EXPIRATION DATE:		
	E: / TITLE mes W. Sanders / Mayor						10/31/2021		
COM	PANY:		FAYETTEVILLE SHALE RELATED: N						
City of Blytheville MAILING ADDRESS:				FAYETTEVILLE SHALE VIOLATIONS: N					
	4 West Walnut St.			INSPECTION PARTICIPANTS					
CITY, STATE, ZIP: Blytheville AR 72315 PHONE & EXT: / FAX: 870-763-3602 / EMAIL:				NAME/TITLE/PHONE/FAX/EMAIL/ETC.: Thomas Jones/Pretreatment Coordinator Roger Ray/Laboratory					
CC	NTACTED DURING INSPECTION:	No							
	(0.0	otiofe -	AREA EVA		/Evoluete	n			
S	PERMIT	U	FLOW MEASUR	isfactory, N=Not Applicable REMENT	N	STORMW	ATER		
M	RECORDS/REPORTS	S	LABORATORY		M		SITE REVIEW		
U	OPERATION & MAINTENANCE	S	EFFLUENT/REC	CEIVING WATER	U	SELF-MON	NITORING PROGRAM		
S	SAMPLING	U	SLUDGE HAND	LING/DISPOSAL	N	PRETREA	TMENT		
N	OTHER:				•				

The following violations were noted and require a written response:

and submit a corrected DMR.

1. There was an error on the April 2016 Discharge Monitoring Report (DMR). The 7-day average TSS concentration was 11 mg/l, but was incorrectly reported as 12 mg/l. Please review similar calculations

SUMMARY OF FINDINGS

2. Improper operation and maintenance; this violates Part III Section B.1.a. of the permit.

- a. The bar screen brushes were worn out, greatly reducing its effectiveness. ***This is a repeat violation***
- b. The gearbox for one of the clarifier rakes was out of service.
- c. There was an extensive accumulation of solids on the clarifier weirs (Photos 1-3).
- d. There was a small tree growing on the curtain in the polishing pond (Photo 4).
- e. Floating solids were passing through to the polishing pond. The majority of floating solids should be removed by the bar screen with the remainder captured in the clarifiers. Once floating solids enter the polishing pond, they are readily discharged out the outfall unless manually screened out.
- f. The sludge storage lagoons were overgrown with vegetation (Photo 5-8). ***This is a repeat violation***
- g. The support bracket for the flow meter transducer was broken resulting in inaccurate readings. Additionally, this violates Part III Section C.2. of the permit which requires flow measurements to have a deviation of less than +/-10% from the actual discharge. A flow calibration check revealed an error of 12% at the time of the inspection.

Office of Water Quality Field Inspector, Sarah Frasher, also participated in this inspection.

The laboratory was much improved since the previous inspection and further improvement is expected. Staff was familiar with approved methods and routine QA/QC practices.

This inspection was performed in conjunction with CEI, SSO, and Stormwater Inspections at all three of the City of Blytheville Wastewater Treatment Plants.

INSPECTOR'S SIGNATURE: SUPERVISOR'S SIGNATURE: Jason Rolenbaugh DATE: 4/27/2017

DATE: 5/10/2017

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:	
1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS:	Øy □n □na □ne
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE:	⊠s □m □u □na □ne
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:	Øy □n □na □ne
h. NAME OF PERSON(S) PERFORMING ANALYSES:	Øy □n □na □ne
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE:	⊠s □m □u □na □ne
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR:	⊠s □m □u □na □ne
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA:	⊠y □n □na □ne
SECTION C: OPERATIONS AND MAINTENANCE	
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED	□S □M ☑U □NA □NE
DETAILS: Multiple items – see "Summary of Findings" on previous page	
1. 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:	☑S ☐M ☐U ☐NA ☐NE
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE:	⊠S □M □U □NA □NE
5. ALL NEEDED TREATMENT UNITS IN SERVICE:	□S □M ☑U □NA □NE
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED:	□S ☑M □U □NA □NE
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED:	⊠S □M □U □NA □NE
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE:	⊠y □n □na □ne
9. STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED:	⊠y □n □na □ne
10. PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED:	⊠y □n □na □ne
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: Ongoing	⊠y □n □na □ne
14. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT:	⊠y □n □na □ne
15. IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT:	□y Øn □na □ne

SECTION D: SAMPLING	
PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS	ØS DM DU DNA DNE
DETAILS:	
SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT:	Øy □n □na □ne
LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES:	MY ON ONA ONE
FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT:	☑Y □N □NA □NE
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
a. SAMPLES REFRIGERATED DURING COMPOSITING:	MY ON ONA ONE
b. 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
SECTION E: FLOW MEASUREMENT	
PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS	□S □M ☑U □NA □NE
DETAILS:	
PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: Yes TYPE OF DEVICE: 2.33' rect: weir w/o end contractions	angular ☑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
SECTION F: LABORATORY	
PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS	☑S □M □U □NA □NE
DETAILS:	
1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(B) FOR SLUDGES):	Øy □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:	MY □N □NA □NE
4. QUALITY CONTROL PROCEDURES ADEQUATE:	ØY □N □NA □NE
5. DUPLICATE SAMPLES ARE ANALYZED ≥10% OF THE TIME:	Øy □n □na □ne
6. SPIKED SAMPLES ARE ANALYZED ≥10% OF THE TIME:	Øy □n □na □ne
7. COMMERCIAL LABORATORY USED:	☑Y □N □NA □NE
a. LAB NAME: Waypoint Analytical	
b. LAB ADDRESS: Memphis, TN	
c. PARAMETERS PERFORMED: Metals, Nutrients, Biomonitoring	
8. BIOMONITORING PROCEDURES ADEQUATE:	Øy □n □na □ne
a. PROPER ORGANISMS USED:	ØY □N □NA □NE
b. PROPER DILUTION SERIES FOLLOWED:	MY ON ONA ONE
c. PROPER TEST METHODS AND DURATION:	ØY □N □NA □NE
d. RETESTS AND/OR TRE PERFORMED AS REQUIRED:	☑Y □N □NA □NE

SECTION C	SECTION G: EFFLUENT/RECEIVING WATERS OBSERVATIONS									
	BASED ON VISUAL OBSERVATIONS ONLY									
				1			O LINA LINE			
_	Floating solids									
OUTFALL #:	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	COLOR	OTHER			
001	None	None	Low	None	*Visible	Clear				
	I: SLUDGE DIS									
	DISPOSAL ME		-				U DNA DNE			
DETAILS:	Sludge is store	<u>ed in old lagoon</u>	s which are ove	ergrown and ina	accessible for full					
1. SLUDGE M	IANAGEMENT ADEQU	ATE TO MAINTAIN EF	FLUENT QUALITY:				□U □NA □NE			
2. SLUDGE R	ECORDS MAINTAINED	D AS REQUIRED BY 40	O CFR 503:			□s □m	□U ☑NA □NE			
3. FOR LAND	APPLIED SLUDGE, TY	YPE OF LAND APPLIE	D TO: (E.G., FOREST,	AGRICULTURAL, PUE	BLIC CONTACT SITE): St	ored in old lagoons				
	SAMPLING IN			_						
	RESULTS WITH	HIN PERMIT R	EQUIREMENT	S			U ⊠NA □NE			
DETAILS:	DETAILS:									
	OBTAINED THIS INSPI					□Y	□n ☑na □ne			
2. TYPE OF S	SAMPLE: GRAB:_	COMPOSITE:_ N	METHOD: FREQUE	NCY:						
3. SAMPLES	PRESERVED:						□N ☑NA □NE			
4. FLOW PRO	PORTIONED SAMPLE	S OBTAINED:					□N ☑NA □NE			
5. SAMPLE O	BTAINED FROM FACIL	LITY'S SAMPLING DE\	/ICE:				□N ☑NA □NE			
6. SAMPLE R	EPRESENTATIVE OF	VOLUME AND NATUR	E OF DISCHARGE:			□Y	□n ☑na □ne			
7. SAMPLE S	PLIT WITH PERMITTEI	E:					□n ☑na □ne			
8. CHAIN-OF-	CUSTODY PROCEDU	RES EMPLOYED:				□Y	□N ☑NA □NE			
9. SAMPLES	COLLECTED IN ACCO	RDANCE WITH PERM	IT:			□Y	□N ☑NA □NE			
	: STORM WATI									
	ATER MANAG	EMENT MEET	S PERMIT RE	QUIREMENTS			U ⊠NA □NE			
DETAILS:										
1. SWPPP UF	PDATED AS NEEDED:_	_ DATE OF LAST UP	DATE:			□Y	□N ☑NA □NE			
2. SITE MAP	INCLUDING ALL DISCH	HARGES AND SURFAC	CE WATERS:			□Y	□N ☑NA □NE			
3. POLLUTIO	N PREVENTION TEAM	I IDENTIFIED:				□Y	□n ☑na □ne			
4. POLLUTIO	N PREVENTION TEAM	PROPERLY TRAINED):			□Y	□n ☑na □ne			
5. LIST OF PO	OTENTIAL POLLUTANT	T SOURCES:				□Y	□N ☑NA □NE			
6. LIST OF PO	OTENTIAL SOURCES A	AND PAST SPILLS AND	D LEAKS:			□Y	□n ☑na □ne			
7. ALL NON-S	STORM WATER DISCH	ARGES ARE AUTHOR	IZED:			□Y	□n ☑na □ne			
8. LIST OF ST	TRUCTURAL BMPS:					□Y	□n ☑na □ne			
9. LIST OF NO	ON-STRUCTURAL BMF	PS:				□Y	□n ☑na □ne			
10. BMPS PRC	PERLY OPERATED A	ND MAINTAINED:				□Y	□n Øna □ne			
11. INSPECTIO	ONS CONDUCTED AS	REQUIRED:				□Y	□n ☑na □ne			

	FLOW CALCULATION SHEET									
	T LOW CALCULATION STILL I									
Date: 3/8	Date: 3/8/2017 Time: 0945									
	Joed in Inches: 19 5* Fact: N/A* *facility flow chart adjusts for channel donth									
Head in Inc	Head in Inches: 18.5* Feet: N/A* *facility flow chart adjusts for channel depth									
Tyne & Siz	e of Primary Flow	Measurer	nent De	vice.						
	ngular weir w/o e									
2.00 .001	ngalai won wo		40110110							
Name & Mo	odel of Secondary	Flow Mea	asureme	ent Dev	rice:					
Greyline S	LT 5.0 Level and	Flow								
Date of last	t Calibration of Se	condary F	low Dev	/ice:	8/9/2016					
	-	11.4	A 1	1 105	0014					
Recorded I	Flow at Date & Tim	ne Listed /	Above:	1405	GPM		(Facility Flow Meter)			
Calculated	Flow at Date & Ti	me Listed	Above:	159	6 GPM					
	ted using flow charts in:					ook-5 th E	 Edition)			
	<u> </u>						<u> </u>			
% Error =	Recorded Value	/alue - Calculated Value			X 100					
/6 LITOI =	Calcu	ue	X 100							
	4.405		4500		<u> </u>					
% Error =	1405	4500	1596		X 100					
	1596									
	-191									
% Error =	1596	X 100								
	1000									
% Error =	-0.1196	X 100								
	-									
% Error =	-12	%								
Comments							14*			
	vestigation revea		ken sur	oport o	n the tran	sduc	er resulting in			
the inaccu	the inaccurate measurement									

DMR Calculation Check

Reporting Period:	From	2016	04	01	_ To	2016	04	30
		Year	Month	Day		Year	Month	Day
Parameter Checked:		TSS	_					
		Loading Mass				Concer Mon		
	Mo.	Avg Ibs/	day	Mo. A	vg ı		7-day Avg	g mg/l
Reported Value:		60.1			9.8		12.0)*
Calculated Value:		60			9.8		11.0)*
Permit Value:		375			30		45	

If calculated value does not equal reported value, explain: *Calculation error

DMR Calculation Check

Reporting Period:	From	2016	12	01	_ To	2016	12	31
		Year	Month	Day		Year	Month	Day
Parameter Checked:		CBOD						
			-					
		Loading				Concen	tration	
		Mass				Mon	thly	
	Mo.	Avg Ibs/c	lay	Mo. A	vg r	mg/l	7-day Avç	j mg/l
Reported Value:		18.4			7.0		7.4	<u> </u>
Calculated Value:		18			7.0		7.4	L
					110			·
Permit Value:		313			25		37.	5

Equal

If calculated value does not equal reported value, explain:



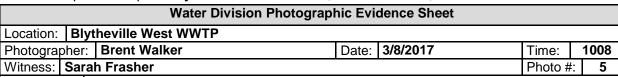
Inspection Report: Blytheville - West WWTP, AFIN: 47-00544, Permit #: AR0022560

Water Division Photographic Evidence Sheet									
Location: Blytheville West WWTP									
Photographer: Brent Walker		Date:	3/8/2017	Time:	1007				
Witness: Sara	Witness: Sarah Frasher Photo #: 3								

Description: Solids accumulated on clarifier weirs

Photograph	er: Brent Walk	er	Date:	3/8/2017	Time	:	1012
Witness: Sarah Frasher					Phot	o #:	4
	_						



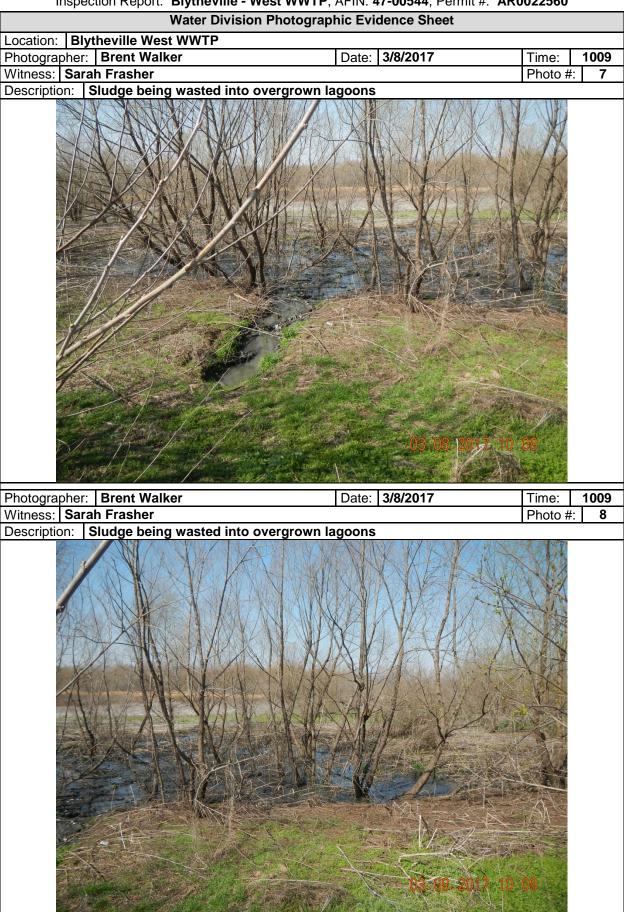


Description: Overgrown sludge lagoons behind aeration basin



Photographer:Brent WalkerDate:3/8/2017Time:1008Witness:Sarah FrasherPhoto #:6

Description: Overgrown sludge lagoons



ADEQ NPDES Enforcement Branch 5301 Northshore Drive North Little Rock, AR 72118-5317

Inspection Response

RE: West Compliance Evaluation

AFIN: 47-00544 NPDES Permit No: AR0022560 Stormwater Permit: ARR00C337

- 1. Error on the April 2016 DMR for 7-day TSS concentration was corrected on spot and resubmitted
- 2. Improper Operation and Maintenance
 - a. Bar screen brushes were ordered May 18, 2017, and will be installed as soon as they are delivered.
 - b. Currently working on locating the gearbox for the Clarifier Rake system, the Win Smith MCTD gearbox has been discontinued and have multiple Vendors looking for a direct replacement.
 - c. Clarifier weirs are being cleaned on a daily basis to keep the accumulation of solids as low as possible.
 - d. Small trees and vegetation has been removed from the curtains and with be done on an as needed basis.
 - e. Operators are currently working on removing floating solids from aeration and polishing basins to help prevent discharge. Properly working bar screens should help with this situation.
 - f. Bush hogging of levee roads will be taking care of by Operators and with reach out to contractor for bids to do the heavy debris removal.
 - g. A metal support frame was fabricated for the flow meter transducer for more accurate reading
- 3. Industrial Stormwater
 - a. Contacted Waste hauler for the dumpsters to be replaced at all locations.
- 4. SSO/Collection System
 - a. Areas with significant issues with I&I are being evaluated to see what projects will need to be addressed.

- b. Currently have two (2) portable generators for backup power. These generators can range from 480/277/240 volts depending on what is needed. Currently looking at getting quick connect jacks for major pumping stations.
- c. Alarm systems have been put into place at all major pumping stations ranging from AC Power failure/High Level Alarm/Low Level Alarm.
- d. Log books have been updated to minimize down time, increase performance and longevity, and to insure pumping stations are being checked twice daily throughout the week

If you have any questions, or need more information please call me at (870)763-4961

Sincerely,

Thomas Jones

Pretreatment Coordinator