



ARKANSAS  
Department of Environmental Quality

January 3, 2019

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

RE: Blytheville Wastewater Treatment Plant Inspections  
West AFIN: 47-00544 Permit No.: AR0022560 & ARR00C337  
North AFIN: 47-00929 Permit No.: AR0022586 & ARR000249  
South AFIN: 47-00926 Permit No.: AR0022578 & ARR00C338

Dear Mayor Sanders:

On May 31, 2018, I performed Wastewater and Industrial Stormwater Inspections of your three wastewater treatment plants referenced above in accordance with the provisions of the Federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, and the regulations promulgated thereunder. These inspections were performed in response to numerous complaints alleging the facilities were not being properly operated and maintained. Copies of the inspection reports are enclosed for your records.

**Please refer to the “Summary of Findings” section of the attached inspection reports and provide a written response for each violation that was noted.** This response should be mailed to the attention of the Office of Water Quality Compliance Branch at the address at the bottom of this letter or e-mailed to [Water-Inspection-Report@adeq.state.ar.us](mailto: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 **January 21, 2019**.

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

Sincerely,

Brent L. Walker  
District 3 Field Inspector  
Water Division



<b>WATER DIVISION INSPECTION REPORT</b>		
AFIN: <b>47-00544</b>	PERMIT #: <b>AR0022560</b>	DATE: <b>5/31/2018</b>
COUNTY: <b>47 Mississippi</b>	PDS #: <b>105937</b>	MEDIA: <b>WN</b>
GPS LAT: <b>35.934850</b> LONG: <b>-89.942647</b> LOCATION: <b>Entrance</b>		

FACILITY INFORMATION	INSPECTION INFORMATION
NAME: <b>Blytheville - West WWTP</b> LOCATION: <b>4952 NCR 635</b> CITY: <b>Blytheville</b>	FACILITY TYPE: <b>1 - Municipal</b> INSPECTOR ID#: <b>52138 S - State</b> FACILITY EVALUATION RATING: <b>N</b> INSPECTION TYPE: <b>Reconnaissance</b> DATE(S): <b>5/31/2018</b> ENTRY TIME: <b>09:15</b> EXIT TIME: <b>11:30</b> PERMIT EFFECTIVE DATE: <b>1/1/2016</b> PERMIT EXPIRATION DATE: <b>10/31/2021</b>
RESPONSIBLE OFFICIAL	FAYETTEVILLE SHALE RELATED: <b>N</b> FAYETTEVILLE SHALE VIOLATIONS: <b>N</b>
NAME / TITLE: <b>James W. Sanders / Mayor</b> COMPANY: <b>City of Blytheville</b> MAILING ADDRESS: <b>124 West Walnut St.</b> CITY, STATE, ZIP: <b>Blytheville AR 72315</b> PHONE & EXT. / FAX: <b>870-763-3602 /</b> EMAIL:	INSPECTION PARTICIPANTS
CONTACTED DURING INSPECTION: <b>No</b>	NAME/TITLE/PHONE/FAX/EMAIL/ETC.: <b>Thomas Jones/Pretreatment Coordinator</b> <b>Gary Carr/Director of Sewer</b>

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

**SUMMARY OF FINDINGS**

The following items were noted at the time of the inspection and require a written response:

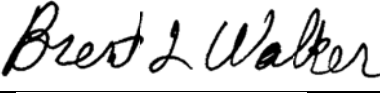

**Improper Operation and Maintenance; this violates Part III, Section B, Item 1. of the permit. (See attached photos for specific examples):**

1. There were multiple locations where vegetation was growing on the air lines and clarifier curtains. This can result in cracking and rapid deterioration of components as roots continue to grow and spread.
2. There were extensive accumulations of solids in the clarifier weirs.
3. The clarifier sludge return was partially clogged and overflowing.
4. There were air leaks due to broken air lines and/or damaged diffusers in the polishing pond. This reduces treatment efficiency and results in increased energy consumption.
5. There was an extensive accumulation of sludge in the polishing pond. This can lead to short circuiting and decreased treatment efficiency. Furthermore, there was a large amount of floating solids/algae on the surface of the polishing pond near the outlet.
6. The facility does not have an adequate operating staff which is duly qualified to carryout operation, maintenance, and testing functions required to insure compliance with the conditions of this permit. The items cited above clearly indicate the facility is being neglected. Based on discussions with the Pretreatment Coordinator and Director of Sewer, it was revealed that there are four (4) licensed operators responsible for all operations and maintenance at the city's three (3) wastewater treatment plants. While the permit does not establish specific staffing requirements, it is highly unlikely that this level of staffing is adequate. If additional operators cannot be provided, then tasks that do not require a licensed operator (mowing, building maintenance, general labor, etc.) should be performed by other employees to allow the licensed operators adequate time to perform their operational duties.

**GENERAL COMMENTS**

This inspection was performed in response to numerous complaints alleging the facility was not being properly operated and maintained.

Inspections were performed at all three WWTPs.

INSPECTOR'S SIGNATURE:  Brent L. Walker	DATE: 12/17/2018
SUPERVISOR'S SIGNATURE:  Jason Bolenbaugh	DATE: 12/18/2018

**Water Division Photographic Evidence Sheet**

Location:	<b>Blytheville – West WWTP</b>		
Photographer:	<b>Brent Walker</b>	Date:	<b>5/31/2018</b>
Witness:	<b>None</b>	Time:	<b>1055</b>
Description:	<b>Bar screen in influent channel.</b>		



Photographer:	<b>Brent Walker</b>	Date:	<b>5/31/2018</b>
Witness:	<b>None</b>	Time:	<b>1057</b>
Description:	<b>Overview of aeration basin. Note vegetation growing on air lines.</b>		



**Water Division Photographic Evidence Sheet**

Location:	<b>Blytheville – West WWTP</b>		
Photographer:	<b>Brent Walker</b>	Date:	<b>5/31/2018</b>
Witness:	<b>None</b>	Time:	<b>1054</b>
		Photo #:	<b>3</b>
Description:	<b>Overview of aeration basin. Note vegetation growing on air lines.</b>		



Photographer:	<b>Brent Walker</b>	Date:	<b>5/31/2018</b>
Witness:	<b>None</b>	Time:	<b>1053</b>
		Photo #:	<b>4</b>
Description:	<b>Overview of aeration basin. Note vegetation growing on air lines.</b>		



**Water Division Photographic Evidence Sheet**

Location:	<b>Blytheville – West WWTP</b>		
Photographer:	<b>Brent Walker</b>	Date:	<b>5/31/2018</b>
Witness:	<b>None</b>	Time:	<b>1051</b>
		Photo #:	<b>5</b>
Description:	<b>Clarifier with excess solids accumulated in weir trough.</b>		



Photographer:	<b>Brent Walker</b>	Date:	<b>5/31/2018</b>
Witness:	<b>None</b>	Time:	<b>1051</b>
		Photo #:	<b>6</b>
Description:	<b>Clarifier with excess solids accumulated in weir trough.</b>		



**Water Division Photographic Evidence Sheet**

Location:	<b>Blytheville – West WWTP</b>		
Photographer:	<b>Brent Walker</b>	Date:	<b>5/31/2018</b>
Witness:	<b>None</b>	Time:	<b>1051</b>
Description:	<b>Clarifier with excess solids accumulated in weir trough.</b>		



Photographer:	<b>Brent Walker</b>	Date:	<b>5/31/2018</b>
Witness:	<b>None</b>	Time:	<b>1052</b>
Description:	<b>Sludge return overflowing due to blockage.</b>		



**Water Division Photographic Evidence Sheet**

Location:	<b>Blytheville – West WWTP</b>		
Photographer:	<b>Brent Walker</b>	Date:	<b>5/31/2018</b>
Witness:	<b>None</b>	Time:	<b>1050</b>
		Photo #:	<b>9</b>
Description:	<b>Overview of polishing pond. Note wastewater spray due to air leaks and/or damaged diffusers.</b>		



Photographer:	<b>Brent Walker</b>	Date:	<b>5/31/2018</b>
Witness:	<b>None</b>	Time:	<b>1101</b>
		Photo #:	<b>10</b>
Description:	<b>Overview of polishing pond. Note wastewater spray due to air leaks and/or damaged diffusers. Also note floating solids/algae and submerged accumulated solids/sludge.</b>		





**Water Division Photographic Evidence Sheet**

Location:	<b>Blytheville – West WWTP</b>		
Photographer:	<b>Brent Walker</b>	Date:	<b>5/31/2018</b>
Witness:	<b>None</b>	Time:	<b>1101</b>
		Photo #:	<b>11</b>
Description:	<b>Overview of polishing pond. Note floating solids/algae.</b>		



Photographer:	<b>Brent Walker</b>	Date:	<b>5/31/2018</b>
Witness:	<b>None</b>	Time:	<b>1101</b>
		Photo #:	<b>12</b>
Description:	<b>Effluent channel with UV disinfection equipment and flow transducer.</b>		



**Water Division Photographic Evidence Sheet**

Location:	<b>Blytheville – West WWTP</b>		
Photographer:	<b>Brent Walker</b>	Date:	<b>5/31/2018</b>
Witness:	<b>None</b>	Time:	<b>1101</b>
		Photo #:	<b>13</b>
Description:	<b>Effluent channel with UV disinfection equipment, flow transducer and weir.</b>		



Photographer:	<b>Brent Walker</b>	Date:	<b>5/31/2018</b>
Witness:	<b>None</b>	Time:	<b>1100</b>
		Photo #:	<b>14</b>
Description:	<b>Effluent flowmeter. Effluent flow was 367 GPM or 0.528 MGD.</b>		

