



ARKANSAS

ENERGY & ENVIRONMENT

February 18, 2022

Todd Pedersen, General Manager
West Memphis Utility Commission
P.O. Box 1868
West Memphis, AR 72301
Sent via email to: tpedersen@citywm.com

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

Dear Mr. Pedersen:

On August 17 and 18, 2021, I performed a Compliance Evaluation Inspection, SSO/Collection System Inspection, Industrial Stormwater Reconnaissance Inspection, Pretreatment Inspection, and Industrial User Inspections of the above referenced facility in accordance with the provisions of the Federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, and the regulations promulgated thereunder. Copies of the inspection reports are enclosed for your records.


Please refer to the “Summary of Findings” section of the inspection reports and provide a written response for each item that was noted. This response should be mailed to the attention of the Office of Water Quality Compliance Branch at the address below my signature or emailed to Water-Inspection-Report@adeq.state.ar.us. This response should contain documentation describing the course of action taken to correct each item noted. The corrective action(s) should be completed as soon as possible and the written response with all necessary documentation (i.e. photos) is due by **March 14, 2022**.

If I can be of any assistance please contact me at frasher@adeq.state.ar.us or 870-935-7221 ext.-15.

Sincerely,

A handwritten signature in black ink, appearing to read 'Sarah Frasher'.

Sarah Frasher
Inspector, Office of Water Quality
5301 Northshore Drive, North Little Rock, AR, 72118

 <p>ENVIRONMENTAL QUALITY</p>	OFFICE OF WATER QUALITY INSPECTION REPORT				
	AFIN: 18-00879 PERMIT #: AR0022039		DATE: 8/17/2021		
	COUNTY: 18 Crittenden	PDS #: 118907	MEDIA: WN		
	GPS LAT: 35.124212 LONG: -90.179016 LOCATION: Entrance				
FACILITY INFORMATION		INSPECTION INFORMATION			
NAME: West Memphis WWTP LOCATION: 502 South Loop Road CITY: West Memphis		FACILITY TYPE: 1 - Municipal INSPECTOR ID#: 112347 S - State FACILITY EVALUATION RATING: 3 - Satisfactory INSPECTION TYPE: Compliance Evaluation			
RESPONSIBLE OFFICIAL		DATE(S): 8/17/2021 ENTRY TIME: 10:15 EXIT TIME: 14:05 PERMIT EFFECTIVE DATE: 11/1/2018 8/18/2021 10:05 16:20 PERMIT EXPIRATION DATE: 10/31/2023			
NAME: / TITLE Todd Pedersen / General Manager COMPANY: West Memphis Utility Commission MAILING ADDRESS: P.O. Box 1868 604 East Cooper CITY, STATE, ZIP: West Memphis AR 72301 PHONE & EXT: / FAX: 870-735-3355 / EMAIL: tpedersen@citywm.com		FAYETTEVILLE SHALE RELATED: N FAYETTEVILLE SHALE VIOLATIONS: N			
CONTACTED DURING INSPECTION: Yes		INSPECTION PARTICIPANTS			
		NAME/TITLE/PHONE/FAX/EMAIL/ETC.: Paul Holloway/ Director of Wastewater/ pholloway@citywm.com Patricia Dixon/ Laboratory Analyst			
AREA EVALUATIONS (S=Satisfactory, M=Marginal, U=Unsatisfactory, N=Not Applicable/Evaluated)					
S	PERMIT	S	FLOW MEASUREMENT	N	STORMWATER
S	RECORDS/REPORTS	S	LABORATORY	N	FACILITY SITE REVIEW
M	OPERATION & MAINTENANCE	S	EFFLUENT/RECEIVING WATER	S	SELF-MONITORING PROGRAM
S	SAMPLING	S	SLUDGE HANDLING/DISPOSAL	N	PRETREATMENT
N	OTHER:				
SUMMARY OF FINDINGS					
The following items were noted for Improper Operation and Maintenance in violation of Part III, Section B.1.a of the permit: <ol style="list-style-type: none"> 1. Solids were observed on the walkway over the oxidation ditches (Photo 5). 2. Overgrown weedy vegetation was observed on the EQ basin levee (Photos 16-18). 					

GENERAL COMMENTS



Peracetic acid is currently used for temporary disinfection since the UV disinfection is non-operational. Plans are in place to replace the UV disinfection system.

West Memphis Utilities is planning modifications to the wastewater plant that include:

1. Grit chamber added to headworks
2. Addition of an extended aeration canal for mitigation of I&I during storm events
3. Clarifier replacement
4. New UV disinfection system
5. EQ basin cleaned and new sumps added
6. Septic waste added from West Memphis businesses only

A SSO/Collection System Inspection, Industrial Stormwater Reconnaissance Inspection, Pretreatment Inspection, and Industrial User Inspections were performed in conjunction with this inspection. Please view each inspection report for details.

Wes Klasky, Jonesboro Area Inspector, also participated in this inspection.

INSPECTOR'S SIGNATURE:  Sarah Frasher	DATE: 10/8/2021
SUPERVISOR'S SIGNATURE:  Brent L. Walker	DATE: 1/27/2022

SECTION A: PERMIT VERIFICATION	
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
DETAILS:	
1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
4. ALL DISCHARGES ARE PERMITTED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
SECTION B: RECORDKEEPING AND REPORTING EVALUATION	
RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
DETAILS:	
1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
a. DATES AND TIME(S) OF SAMPLING:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
b. EXACT LOCATION(S) OF SAMPLING:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
c. NAME OF INDIVIDUAL PERFORMING SAMPLING:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
d. ANALYTICAL METHODS AND TECHNIQUES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
e. RESULTS OF CALIBRATIONS:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
f. RESULTS OF ANALYSES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
g. DATES AND TIMES OF ANALYSES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
h. NAME OF PERSON(S) PERFORMING ANALYSES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
SECTION C: OPERATIONS AND MAINTENANCE	
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED	<input type="checkbox"/> S <input checked="" type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
DETAILS: Solids on walkway of oxidation ditches. Accumulation of overgrown vegetation around EQ basin.	
1. TREATMENT UNITS PROPERLY OPERATED:	<input type="checkbox"/> S <input checked="" type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
2. TREATMENT UNITS PROPERLY MAINTAINED:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
5. ALL NEEDED TREATMENT UNITS IN SERVICE:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
9. STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
10. PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
11. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR:	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
12. IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
13. HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
14. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT:	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
15. IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE

SECTION D: SAMPLING	
PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
DETAILS:	
1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
6. SAMPLE COLLECTION PROCEDURES ADEQUATE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
a. SAMPLES REFRIGERATED DURING COMPOSITING:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
b. PROPER PRESERVATION TECHNIQUES USED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
c. CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
7. IF MONITORING IS PERFORMED MORE OFTEN THAN REQUIRED ARE RESULTS REPORTED ON THE DMR:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
SECTION E: FLOW MEASUREMENT	
PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
DETAILS:	
1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: <u>Yes</u> TYPE OF DEVICE: <u>ISCO Signature Flowmeter</u>	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
4. CALIBRATION FREQUENCY ADEQUATE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
5. RECORDS MAINTAINED OF CALIBRATION PROCEDURES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
6. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
7. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
8. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
9. HEAD MEASURED AT PROPER LOCATION:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
SECTION F: LABORATORY	
PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
DETAILS:	
1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(B) FOR SLUDGES) :	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
4. QUALITY CONTROL PROCEDURES ADEQUATE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
5. DUPLICATE SAMPLES ARE ANALYZED \geq 10% OF THE TIME:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
6. SPIKED SAMPLES ARE ANALYZED \geq 10% OF THE TIME:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
7. COMMERCIAL LABORATORY USED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
a. LAB NAME: <u>Waypoint Analytical</u>	
b. LAB ADDRESS: <u>Memphis, TN</u>	
c. PARAMETERS PERFORMED: <u>WET Testing, Total Phosphorus, Nitrate + Nitrite Nitrogen</u>	
8. BIOMONITORING PROCEDURES ADEQUATE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
a. PROPER ORGANISMS USED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
b. PROPER DILUTION SERIES FOLLOWED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
c. PROPER TEST METHODS AND DURATION:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
d. RETESTS AND/OR TRE PERFORMED AS REQUIRED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE

SECTION G: EFFLUENT/RECEIVING WATERS OBSERVATIONS							
BASED ON VISUAL OBSERVATIONS ONLY						<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE	
DETAILS:							
OUTFALL #:	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	COLOR	OTHER
001	None	None	Medium	None	None	Green	--
SECTION H: SLUDGE DISPOSAL							
SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS						<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE	
DETAILS:							
1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY:						<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE	
2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503:						<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE	
3. FOR LAND APPLIED SLUDGE, TYPE OF LAND APPLIED TO: (E.G., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE):							
SECTION I: SAMPLING INSPECTION PROCEDURES							
SAMPLE RESULTS WITHIN PERMIT REQUIREMENTS						<input type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
DETAILS:							
1. SAMPLES OBTAINED THIS INSPECTION:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
2. TYPE OF SAMPLE: <input type="checkbox"/> GRAB:___ <input type="checkbox"/> COMPOSITE:___ METHOD:___ FREQUENCY:___							
3. SAMPLES PRESERVED:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
4. FLOW PROPORTIONED SAMPLES OBTAINED:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
6. SAMPLE REPRESENTATIVE OF VOLUME AND NATURE OF DISCHARGE:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
7. SAMPLE SPLIT WITH PERMITTEE:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
SECTION J: STORM WATER POLLUTION PREVENTION PLAN							
STORM WATER MANAGEMENT MEETS PERMIT REQUIREMENTS						<input type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
DETAILS: <u>See Industrial Stormwater Inspection report for details.</u>							
1. SWPPP UPDATED AS NEEDED:___ DATE OF LAST UPDATE:___						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
2. SITE MAP INCLUDING ALL DISCHARGES AND SURFACE WATERS:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
3. POLLUTION PREVENTION TEAM IDENTIFIED:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
4. POLLUTION PREVENTION TEAM PROPERLY TRAINED:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
5. LIST OF POTENTIAL POLLUTANT SOURCES:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
6. LIST OF POTENTIAL SOURCES AND PAST SPILLS AND LEAKS:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
7. ALL NON-STORM WATER DISCHARGES ARE AUTHORIZED:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
8. LIST OF STRUCTURAL BMPS:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
9. LIST OF NON-STRUCTURAL BMPS:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
10. BMPS PROPERLY OPERATED AND MAINTAINED:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
11. INSPECTIONS CONDUCTED AS REQUIRED:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	

DMR Calculation Check

Reporting Period: From 2020 02 01 To 2020 02 29
 Year Month Day Year Month Day

Parameter Checked: BOD

	Loading Mass Mo. Avg. - lbs/day	Concentration Monthly Mo. Avg. - mg/l	7-day Avg. - mg/l
Reported Value:	<u>394</u>	<u>5.9</u>	<u>7.2</u>
Calculated Value:	<u>394</u>	<u>5.9</u>	<u>7.2</u>
Permit Value:	<u>1576.3</u>	<u>30.0</u>	<u>45.0</u>

If calculated value does not equal reported value, explain: Equal

DMR Calculation Check

Reporting Period: From 2021 04 01 To 2021 04 30
Year Month Day Year Month Day

Parameter Checked: FCB

**Loading
Mass**

Mo. Avg. - lbs/day

**Concentration
Monthly**

Mo. Avg. - mg/l

7-day Avg. - mg/l

Reported Value: _____

188

1645

Calculated Value: _____

188

1645

Permit Value: _____

1000

2000

If calculated value does not equal reported value, explain: Equal

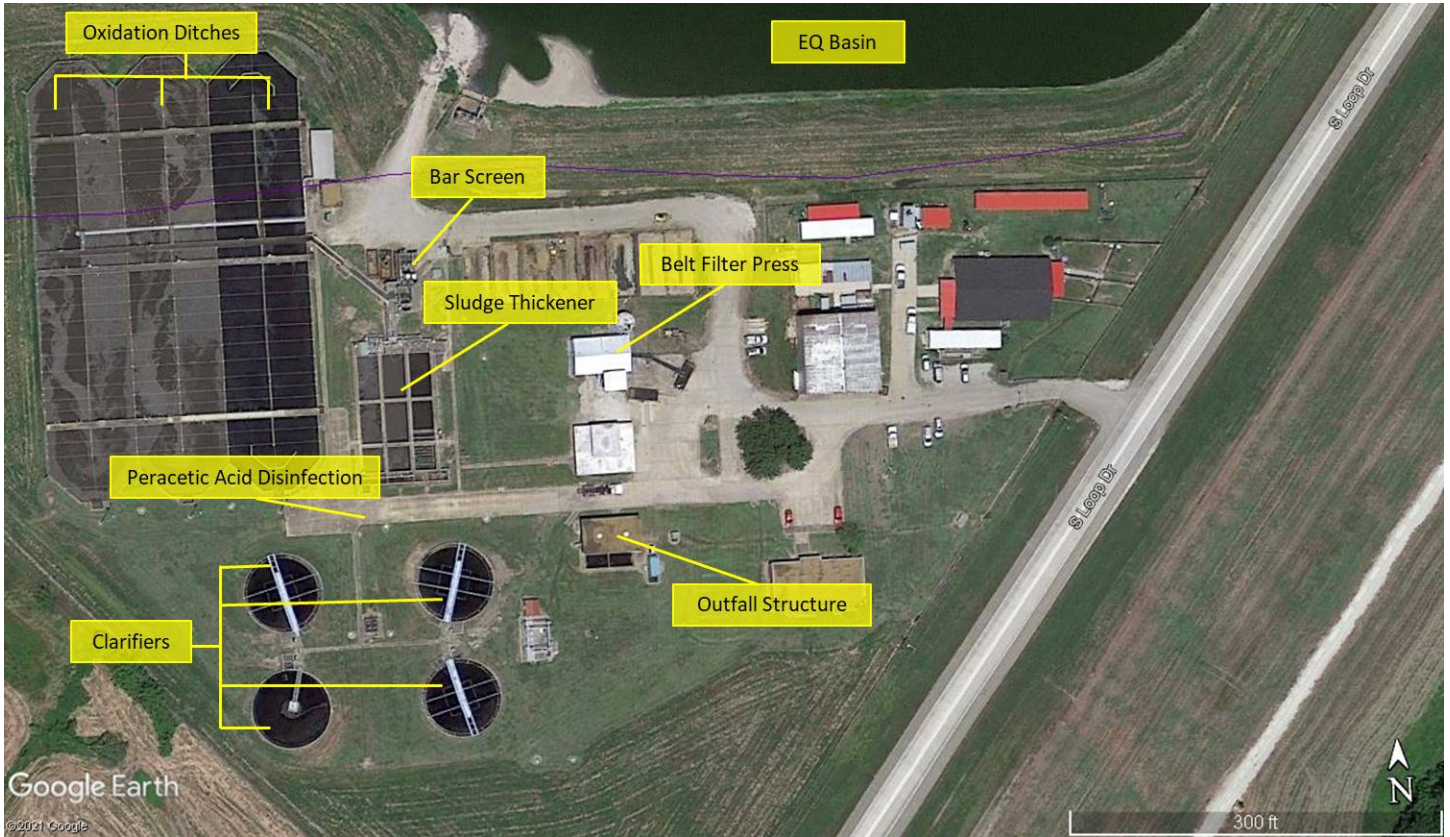


Figure. Google Earth image of the West Memphis WWTP with labels for the different areas of treatment.

Office of Water Quality Photographic Evidence Sheet

Location:	West Memphis WWTP		
Photographer:	Sarah Frasher	Date:	8/17/2021
Witness:	Wes Klasky	Time:	10:55
		Photo #:	1
Description:	Overview of the headworks of the plant.		



Photographer:	Sarah Frasher	Date:	8/17/2021
Witness:	Wes Klasky	Time:	10:24
		Photo #:	2
Description:	View of the bar screen at the headworks.		



Office of Water Quality Photographic Evidence Sheet

Location:	West Memphis WWTP		
Photographer:	Sarah Frasher	Date:	8/17/2021
Witness:	Wes Klasky	Time:	10:56
		Photo #:	3
Description:	Overview of the oxidation ditches.		



Photographer:	Sarah Frasher	Date:	8/17/2021
Witness:	Wes Klasky	Time:	10:31
		Photo #:	4
Description:	View of the oxidation ditches.		



Office of Water Quality Photographic Evidence Sheet

Location:	West Memphis WWTP		
Photographer:	Sarah Frasher	Date:	8/17/2021
Witness:	Wes Klasky	Time:	10:31
		Photo #:	5
Description:	View of the walkway on the oxidation ditches. Note the accumulation of solids.		



Photographer:	Sarah Frasher	Date:	8/17/2021
Witness:	Wes Klasky	Time:	10:36
		Photo #:	6
Description:	View of the sludge thickener.		



Office of Water Quality Photographic Evidence Sheet

Location:	West Memphis WWTP		
Photographer:	Sarah Frasher	Date:	8/17/2021
Witness:	Wes Klasky	Time:	10:37
		Photo #:	7
Description:	Overview of the clarifiers.		



Photographer:	Sarah Frasher	Date:	8/17/2021
Witness:	Wes Klasky	Time:	10:38
		Photo #:	8
Description:	Close-up view of the clarifier.		



Office of Water Quality Photographic Evidence Sheet

Location:	West Memphis WWTP		
Photographer:	Sarah Frasher	Date:	8/17/2021
Witness:	Wes Klasky	Time:	10:39
		Photo #:	9
Description:	View of one of the clarifiers. Note the sludge.		



Photographer:	Sarah Frasher	Date:	8/17/2021
Witness:	Wes Klasky	Time:	10:37
		Photo #:	10
Description:	View of the temporary disinfection system of peracetic acid.		



Office of Water Quality Photographic Evidence Sheet

Location:	West Memphis WWTP		
Photographer:	Sarah Frasher	Date:	8/17/2021
Witness:	Wes Klasky	Time:	10:43
		Photo #:	11
Description:	View on the removed UV disinfection system.		



Photographer:	Sarah Frasher	Date:	8/17/2021
Witness:	Wes Klasky	Time:	10:44
		Photo #:	12
Description:	View of the sampling equipment.		



Office of Water Quality Photographic Evidence Sheet

Location:	West Memphis WWTP		
Photographer:	Sarah Frasher	Date:	8/17/2021
Witness:	Wes Klasky	Time:	10:46
		Photo #:	13
Description:	View of the outfall structure. Note the color of the water.		



Photographer:	Sarah Frasher	Date:	8/17/2021
Witness:	Wes Klasky	Time:	10:51
		Photo #:	14
Description:	View of the belt filter press.		



Office of Water Quality Photographic Evidence Sheet

Location:	West Memphis WWTP		
Photographer:	Sarah Frasher	Date:	8/17/2021
Witness:	Wes Klasky	Time:	10:51
Description:	View of the dumpster that catches the waste sludge.		



Photographer:	Sarah Frasher	Date:	8/17/2021
Witness:	Wes Klasky	Time:	10:56
Description:	View of the EQ basin. Note the overgrown vegetation.		



Office of Water Quality Photographic Evidence Sheet

Location:	West Memphis WWTP		
Photographer:	Sarah Frasher	Date:	8/17/2021
Witness:	Wes Klasky	Time:	10:55
		Photo #:	17
Description:	View of the EQ basin. Note the overgrown vegetation.		

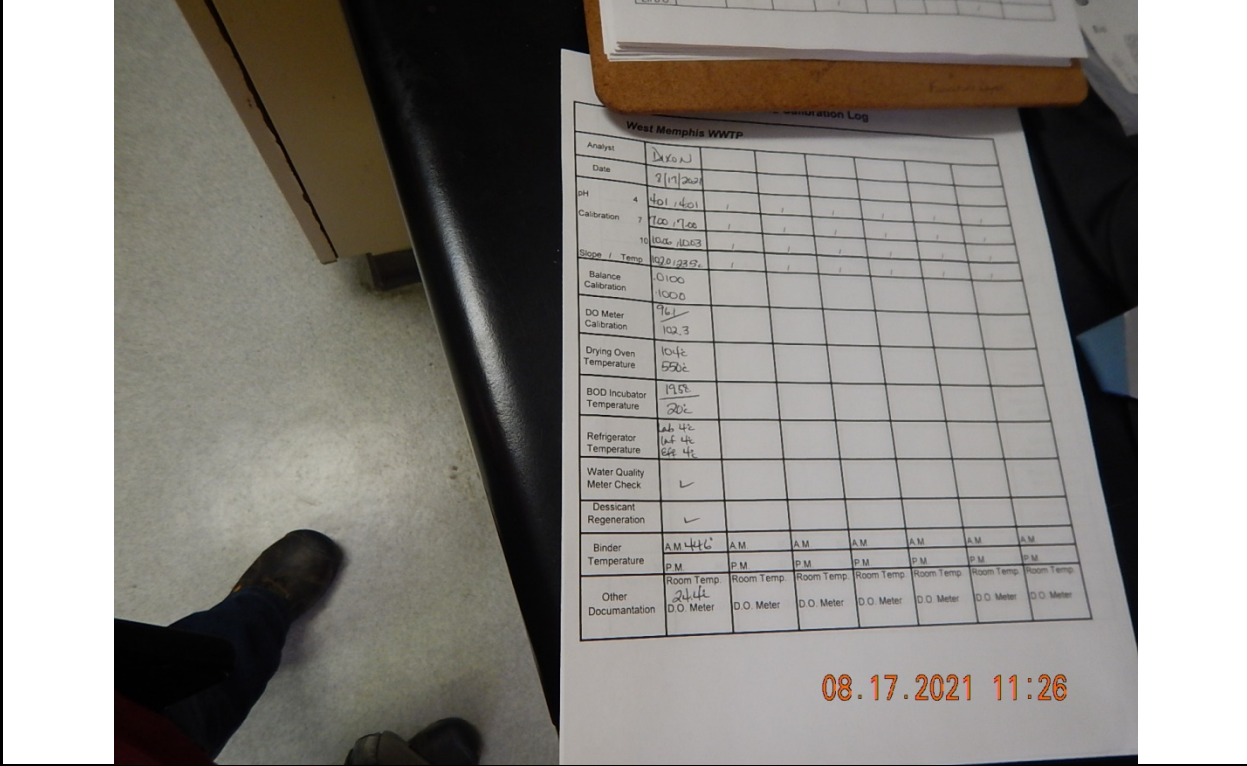


Photographer:	Sarah Frasher	Date:	8/17/2021
Witness:	Wes Klasky	Time:	10:56
		Photo #:	18
Description:	View of the overgrown vegetation on the EQ basin levee.		

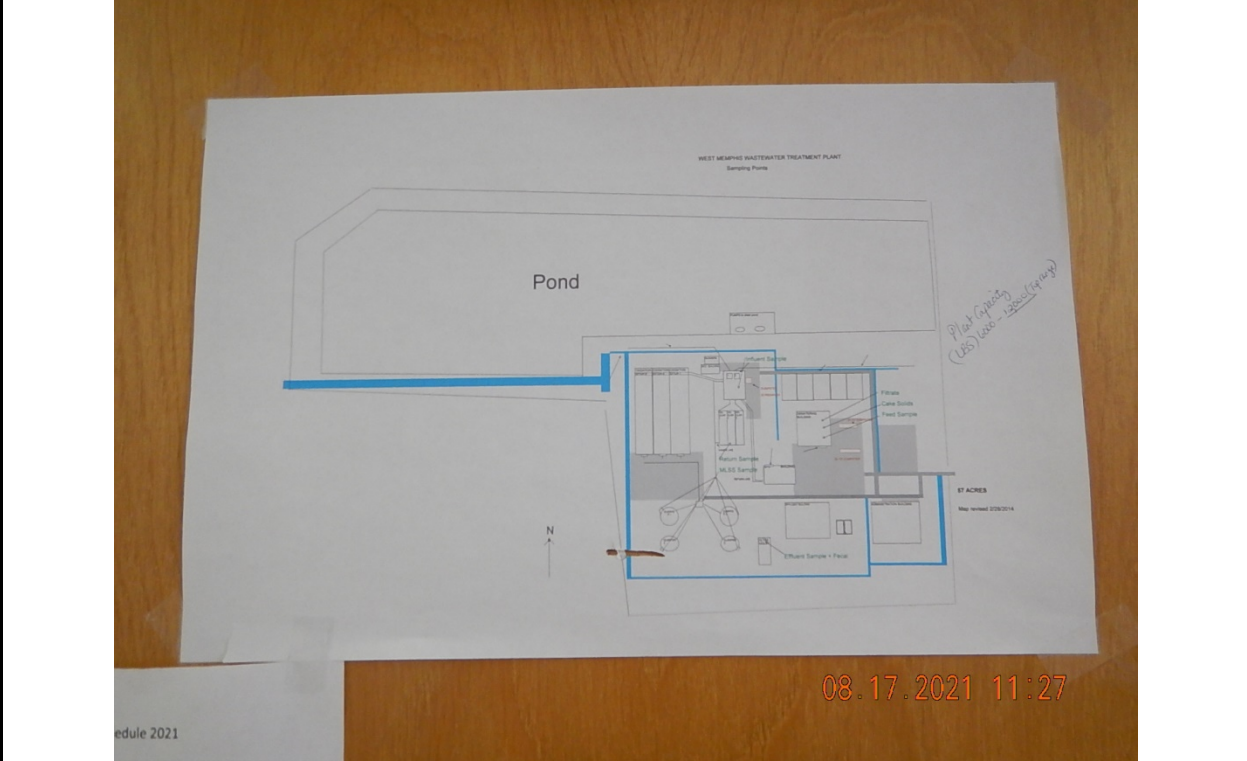


Office of Water Quality Photographic Evidence Sheet

Location:	West Memphis WWTP		
Photographer:	Sarah Frasher	Date:	8/17/2021
Witness:	Wes Klasky	Time:	11:26
Description:	View of the laboratory bench sheets.		



Photographer:	Sarah Frasher	Date:	8/17/2021
Witness:	Wes Klasky	Time:	11:27
Description:	View of the flow diagram showing the wastewater treatment.		



Bolenbaugh, Jason

From: Denise Bosnick <dbosnick@westmemphisar.gov>
Sent: Monday, March 14, 2022 10:25 AM
To: Water-Inspection-Report; Frasher, Sarah; Walker, Brent
Cc: Todd Pedersen; Ward Wimbish
Subject: West Memphis Compliance Inspection
Attachments: Signed Letters.pdf; Quala pictures from inspection-2-28-22.docx; Quala pictures taken on 3-1-22.docx

Follow Up Flag: Follow up
Flag Status: Flagged

Attached is our response for our Compliance Inspection dated August 17 and 18, 2021



WEST MEMPHIS UTILITIES

Denise Bosnick
Director of Environmental Quality

604 East Cooper
P O Box 1868
West Memphis, AR 72303
Phone: 870-702-5141
Fax: 870-732-7623
dbosnick@westmemphisar.gov
www.westmemphisar.gov



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

March 14, 2022

Arkansas Department of Energy
and Environment
Office of Water Quality Compliance Branch
5301 Northshore Drive
North Little Rock, Arkansas 72118

RE: Summary of Findings
AFIN: 18-00879 Permit No: AR0022039

Enclosed is the response of Compliance Evaluation Inspection performed on August 17-18, 2021.

Wastewater Treatment Plant Inspection:
Response enclosed from Paul Holloway-Director of Wastewater

SSO/Collection System Inspection:
No violations noted

Pretreatment Inspection:
Response enclosed from Denise Bosnick-Director of Environmental Quality

Industrial User Inspection:
Quala Services
400 Mound City Road
Response included with the Pretreatment Inspection
Coca-Cola Consolidated
1400 Rainer Road
No response required



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

March 14, 2022

Office of Water Quality Compliance Branch
Arkansas Department of Energy and Environment
5301 Northshore Drive
North Little Rock, Arkansas 72118

RE: West Memphis WWTP Inspection
Permit No.: AR0022039

The following violations were noted during the Pretreatment Compliance Inspection performed on August 18, 2021.

1. SIUs (Significant Industrial Users) are not being inspected annually as required. It is understood that this was due in part to the Covid-19 pandemic. Inspection should resume as soon as possible.

Inspections have resume as of this date two (2) have been performed. Quala Serivces-400 Mound City Road and PSC, Custom, LLC (previously Grace Trailer Service)-615 Petro Cove.

2. The following items were noted during the Industrial User Inspection of Quala Services, LLC:
Sampling Location is suitable for representative sampling but may not provide adequate protection against tampering.
Facility did not have adequate staff for operating and maintaining equipment.
The secondary containment for the outdoor wastewater holding tank was full of visibly contaminated water.
The polymer equipment was reported as non-operational during the inspection.
An accumulation of visible solids was in the outfall tank prior to the weir, thus indicating pass through and /or inadequate treatment.

When the state inspection was performed at Quala the condition of the facility was horrendous. They cleaned the facility up, but when we did the inspection on February 28, 2022, the condition of the facility was again horrendous. I closed the business that morning and total them they could not discharge. The following morning, we went back to check on the facility and everything had been cleaned up. Pictures are included.

Quala continues to be inadequately staffed. They claim that cannot get people to apply.

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

From – Paul Holloway

Date – 2/23/2022

To – ADEQ

Subject – O & M Violations , State Inspection

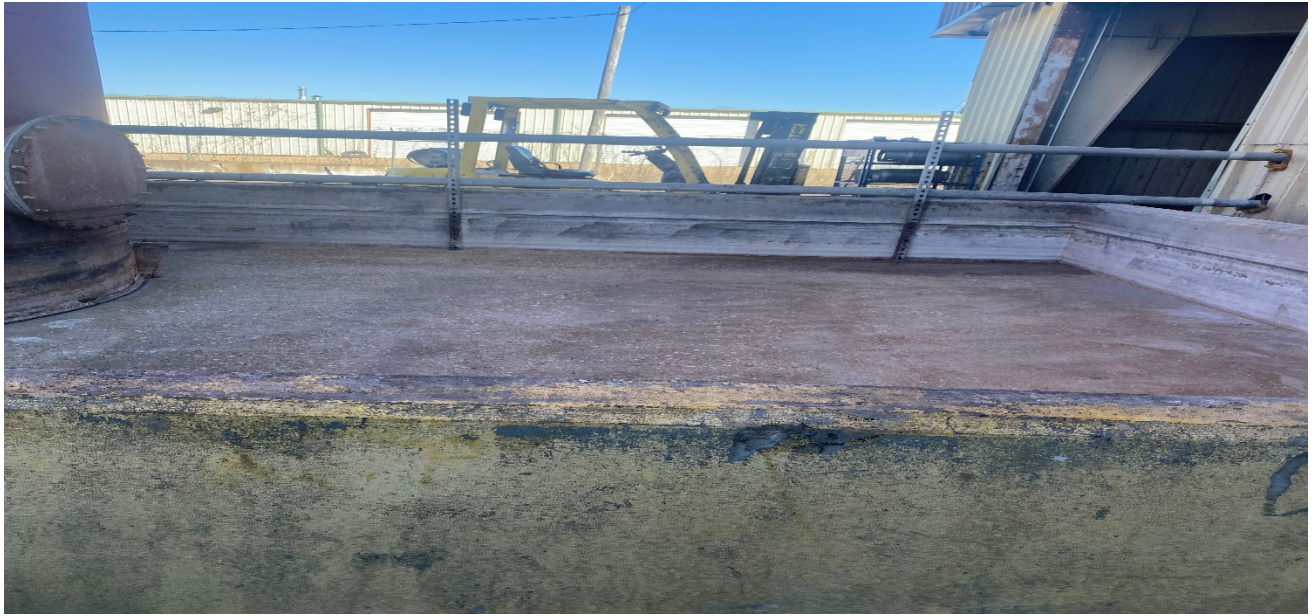
1 Solids was observed on the walkway over the oxidation ditches.

This will be resolved in the new plant modifications. There is no water that is hitting the ground.

2 Overgrown weedy vegetation was observed on the EQ basin levee.

The sanitation department needs to come and cut the grass on a more frequent basis. I will make sure
That the levee is cut more often.

Paul Holloway

















Bolenbaugh, Jason

From: Denise Bosnick <dbosnick@westmemphisar.gov>
Sent: Monday, March 14, 2022 11:31 AM
To: Water-Inspection-Report; Frasher, Sarah; Walker, Brent
Cc: Todd Pedersen; Ward Wimbish
Subject: Correction to response letter
Attachments: ADEEQ Inspection Response Letter-2022.docx

Follow Up Flag: Follow up
Flag Status: Flagged

There was time added for the inspections to be completed and word correction.



WEST MEMPHIS UTILITIES

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Director of Environmental Quality

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

March 14, 2022

Office of Water Quality Compliance Branch
Arkansas Department of Energy and Environment
5301 Northshore Drive
North Little Rock, Arkansas 72118

RE: West Memphis WWTP Inspection
Permit No.: AR0022039

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Inspections have resume as of this date two (2) have been performed. Quala Serivces-400 Mound City Road and PSC, Custom, LLC (previously Grace Trailer Service)-615 Petro Cove. All inspections will be done by May 1, 2022.

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Denise Bosnick
Director Environmental Quality