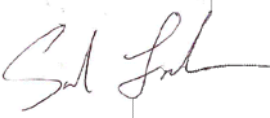
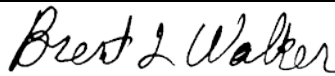
 <b>ENVIRONMENTAL QUALITY</b>		<b>OFFICE OF WATER QUALITY INSPECTION REPORT</b>				
		AFIN: 18-00879		PERMIT #: AR0022039		DATE: 8/18/2021
		COUNTY: 18 Crittenden		PDS #: 118910		MEDIA: WN
		GPS LAT: 35.124212 LONG: -90.179016 LOCATION: Entrance				
FACILITY INFORMATION			INSPECTION INFORMATION			
NAME: <b>West Memphis WWTP</b> LOCATION: <b>502 South Loop Road</b> CITY: <b>West Memphis</b>			FACILITY TYPE: <b>Municipal</b>	INSPECTOR ID#: <b>112347 S - State</b>		
			FACILITY EVALUATION RATING: <b>N</b>		INSPECTION TYPE: <b>Pretreatment Compliance</b>	
			DATE(S): <b>8/18/2021</b>	ENTRY TIME: <b>10:05</b>	EXIT TIME: <b>16:20</b>	PERMIT EFFECTIVE DATE: <b>11/1/2018</b>
			<b>8/17/2021</b>	<b>10:15</b>	<b>14:05</b>	PERMIT EXPIRATION DATE: <b>10/31/2023</b>
RESPONSIBLE OFFICIAL			FAYETTEVILLE SHALE RELATED: <b>N</b>			
NAME: / TITLE <b>Todd Pedersen / General Manager</b> COMPANY: <b>West Memphis Utility Commission</b> MAILING ADDRESS: <b>P.O. Box 1868, 604 East Cooper</b> CITY, STATE, ZIP: <b>West Memphis AR 72301</b> PHONE & EXT: / FAX: <b>870-735-3355 /</b> EMAIL: <b>tpedersen@citywm.com</b>			FAYETTEVILLE SHALE VIOLATIONS: <b>N</b>			
CONTACTED DURING INSPECTION: <b>Yes</b>			INSPECTION PARTICIPANTS			
			NAME/TITLE/PHONE/FAX/EMAIL/ETC.: <b>West Memphis: Denise Bosnick/            dbosnick@citywm.com &amp; Marvin Jones</b>  <b>DEQ: Sarah Frasher, Wes Klasky, Brent Walker</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>U</b>	RECORDS/REPORTS	<b>N</b>	LABORATORY	<b>N</b>	FACILITY SITE REVIEW	
<b>M</b>	OPERATION & MAINTENANCE	<b>N</b>	EFFLUENT/RECEIVING WATER	<b>N</b>	SELF-MONITORING PROGRAM	
<b>S</b>	SAMPLING	<b>N</b>	SLUDGE HANDLING/DISPOSAL	<b>M</b>	PRETREATMENT	
<b>N</b>	OTHER:					
SUMMARY OF FINDINGS						
<p>The following violations were noted during the Pretreatment Compliance Inspection:</p> <ol style="list-style-type: none"> <li>1. SIUs (Significant Industrial Users) are not being inspected annually as required. It is understood that this is due in part to the Covid-19 pandemic. Inspections should resume as soon as possible. If traditional inspections cannot be performed, alternative inspection methods should be developed.</li> <li>2. The following items were noted during the Industrial User Inspection of Quala Services, LLC:               <ol style="list-style-type: none"> <li>a. Sampling location is suitable for representative sampling, but may not provide adequate protection against tampering.</li> <li>b. Facility did not have adequate staff for operating and maintaining equipment.</li> <li>c. The secondary containment for the outdoor wastewater holding tank was nearly full of visibly contaminated water.</li> <li>d. The polymer equipment was reported as non-operational during the inspection.</li> <li>e. An accumulation of visible solids were in the outfall tank prior to the weir, thus indicating likely pass through and/or inadequate treatment.</li> </ol> </li> </ol>						

**GENERAL COMMENTS**

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

Wes Klasky, Jonesboro Area Inspector, and Brent Walker, Inspector Supervisor, also participated in this inspection.

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

**DIVISION OF ENVIRONMENTAL QUALITY  
PRETREATMENT COMPLIANCE INSPECTION (PCI) REPORT**

Name of Municipality: <b>West Memphis Utility Commission</b>
AFIN Number: <b>18-00879</b>
NPDES Permit Number(s): <b>AR0022039</b>
Program Tracked under NPDES Permit Number: <b>AR0022039</b>
Fact Sheet Preparation Date: <b>N/E</b>
Date of Last PCI/Audit: <b>05/25/2016</b>
Date of Last Annual Report: <b>8/3/2021</b>
Name of Inspector: <b>Sarah Frasher</b>
Date PCI Performed: <b>8/18/2021</b>
Name and Title of Facility Representative: <b>Denise Bosnick</b>
Name and Title of Other Participants: <b>Brent Walker DEQ, Inspector Supervisor and Wes Klasky, DEQ Inspector</b>
Number of IUs Visited: <b>2</b>
Name(s) of IUs Visited: <b>Coca-Cola Bottling Company, Consolidated; Quala Services, LLC</b>
AN IU SITE VISIT FORM SHOULD BE COMPLETED FOR EACH IU VISITED
<b>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.</b>

<b>A. INDUSTRIAL USER SURVEY</b>		
1. List any Significant Industrial Users (SIUs) which have been added or deleted from the program since the last audit or inspection.		
<b>Nu-Way Products no longer in operation</b>		
2. Has ADEQ or EPA been notified of these changes?		
<b>Yes</b>		
<b>3. HAS THE INDUSTRIAL USER SURVEY BEEN KEPT UPDATED?</b>		
<b>Yes (2020)</b>		
4. What procedures are being used to update the IU Survey?		
<b>New city permits, new connections, Code Enforcement, Economic Development</b>		
<b>Obtained responses from a mailed survey in 2018 from all potential IUS</b>		
<b>Business licenses checked on a monthly basis</b>		
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): <b>6</b>		
6. Number of Categorical Industrial Users: <b>5</b>		
7. How does the POTW determine the appropriate categorical standards to apply to an IU?		
<b>NAICS &amp; 40 CFR</b>		
8. List all of the Categorical IUs discharging under the approved program. Include the name of the IU, the regulatory category (i.e. Metal Finishing), and the regulated process (i.e. phosphatizing, zinc plating, etc.). Additional listings can be made in the comments section if necessary.		
Name of IU:	Category:	Regulated Process:
<b>Quala Services, LLC</b>	<b>Truck Wash</b>	<b>Int./Ext. Truck Wash</b>
<b>Grace Trailer</b>	<b>Truck Wash</b>	<b>Int./Ext. Truck Wash</b>
<b>Wastewater Solutions</b>	<b>Centralized Waste Treatment/ Multi-stream Sub Part D.</b>	<b>Treatment of Hauled Wastewater</b>
<b>Master Halco</b>	<b>Metal Finishing</b>	<b>Iron &amp; Steel</b>
<b>Automated Conveyors</b>	<b>Metal Finishing</b>	<b>Metal Plating</b>

<b>B. LOCAL LIMITS</b>					
1. IS THE POTW APPLYING LOCAL LIMITS WHICH HAVE BEEN APPROVED BY ADEQ OR EPA? Yes, no specific numeric limits for current IUs. Applied when appropriate.					
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?					
<b>Pollutant:</b>		<b>Sampling Frequency</b>		<b>Permit Requirement</b>	
				<b>Program Requirement</b>	
Metals:					
Influent:		4/yr		4/yr	None
Effluent:		4/yr		4/yr	None
Sludge:		1/yr		N/A	None
Organics:					
Influent:		1/yr		1/yr	None
Effluent:		1/yr		1/yr	None
Sludge:		1/yr		N/A	None
Comments:					
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?					
None					

<b>C. INDUSTRIAL USER CONTROL MECHANISM</b>
1. Is the POTW using the type of control mechanism (permit, agreement, etc.) required by the approved program?
<b>Yes, permit</b>
2. How many IU permits (or other control documents) have been issued?
<b>6 SIU, 2 NSIU</b>
<b>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.</b>
<b>Yes, Permit renewal 6/1/2020 until 5/31/2023</b>
4. Does the control document contain the following items? List the section of the permit each item is listed under.
An expiration date: <b>Yes</b>
Discharge limitations: <b>Yes</b>
If the program requires self-monitoring by the IUs, do the permits contain the following information? List the section of the permit each requirement is listed under.
IU self-monitoring requirements: <b>N/A</b>
IU reporting requirements: <b>N/A</b>
5. Indicate which of the following recommended standard conditions are contained in the control documents. List the section of the permit each requirement is listed under.
Sample location: <b>Yes</b>
Type of sample: <b>Yes</b>
Monitoring frequency: <b>Yes</b>
Bypass prohibition: <b>Yes</b>
Right of entry: <b>Yes</b>
Non-transferability: <b>Yes</b>
Revocation clause: <b>Yes</b>
Penalty Provisions: <b>Yes</b>
Slug load notification: <b>Yes</b>
Notification of process change: <b>Yes</b>

<b>D. MONITORING OF IUS BY POTW</b>			
1. Indicate current inspection and sampling frequency and program requirement below.			
		Current frequency:	Program Requirements:
Sampling:			
Categorical IUs		<b>2/month</b>	<b>1/yr</b>
Other SIUs		<b>1/month</b>	<b>1/yr</b>
Non-SIUs		<b>N/A</b>	
Inspection:			
Categorical IUs		<b>1/yr (3 done in 2019)</b>	<b>1/yr</b>
Other SIUs		<b>Not inspected</b>	
Non-SIUs		<b>N/A</b>	
Comments: <b>No inspections conducted in 2020 or 2021 due to Covid.</b>			
2. HAS EACH SIU BEEN INSPECTED AND SAMPLED AT THE FREQUENCY REQUIRED BY THE APPROVED PROGRAM?			
<b>No, see note above.</b>			
3. Are inspections announced or unannounced?			
<b>Both</b>			
4. Are records kept of each inspection?			
<b>Yes</b>			
5. Does the inspection report contain an adequate description of the following:			
Date and time of inspection: <b>Yes</b>			
Officials present: <b>Yes</b>			
Inspection of chemical storage areas: <b>Yes</b>			
Description of regulated processes, categorical waste streams, and discharge location of these waste streams: <b>Yes</b>			
Inspection of the pretreatment facilities: <b>Yes</b>			
Review of self-monitoring records: <b>Yes</b>			
Observation of IU self-monitoring procedures: <b>N/A</b>			
Verification that approved analytical techniques are used: <b>N/A</b>			
Verification of IU flow measurement (where required): <b>N/A</b>			
6. Please describe the overall adequacy of inspection documentation:			
<b>Inspections have not been conducted since September 2019. These inspections need to resume.</b>			
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).			
<b>Yes</b>			
8. Are analyses performed in accordance with EPA-approved methods (40 CFR 136)?			
<b>Yes, with the following being analyzed by West Memphis Utilities: pH, COD, BOD, and TSS</b>			

9. Are sampling and flow monitoring equipment properly maintained?
<b>Yes</b>
10. Is the POTW keeping proper field notes and chain of custody forms?
<b>Yes</b>
11. Is the sampling location representative of the discharge to the collection system?
<b>Yes</b>
12. Are sampling locations identified in POTW records?
<b>Yes</b>
13. Are sampling services available in an emergency?
<b>Yes</b>
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?
<b>Updated BMRs needed</b>
15. <b>ARE SELF-MONITORING REPORTS REVIEWED TO VERIFY THAT ANALYSES WERE PERFORMED FOR ALL REGULATED PARAMETERS, AND TO EVALUATE COMPLIANCE WITH EFFLUENT LIMITS?</b>
<b>N/A</b>
16. <b>IF VIOLATIONS ARE FOUND IN REPORTS, DOES THE POTW RESPOND TO ALL VIOLATIONS?</b>
<b>N/A</b>
17. What are the POTW's procedures for following up violations?
<b>Letter Notice of Violations, Response due within 15 days, a re-sample within 30 days, Another letter sent if more violations</b>
18. <b>HAS THE POTW REVIEWED BMRS FOR COMPLIANCE WITH 40 CFR 403.12(b)?</b> Yes
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: <b>Yes</b>
Other environmental permits held: <b>No</b>
Description of operations: <b>Yes</b>
Process flow diagrams: <b>Yes</b>
Flow measurements: <b>Water usage</b>
Measurements of regulated pollutants: <b>Yes</b>
Certification of compliance by the IU: <b>Yes</b>
Compliance schedule (if needed): <b>N/A</b>
19. Additional comments on the POTW's inspection and sampling procedures:
<b>None</b>



<b>E. Enforcement</b>			
<b>1. HAS THE POTW IMPLEMENTED ENFORCEMENT RESPONSE PROCEDURES TO ADEQUATELY ADDRESS EVERY IU VIOLATION OF PRETREATMENT STANDARDS AND REQUIREMENTS?</b>			
<b>Yes</b>			
<b>2. How does the POTW respond to the following violations?</b>			
Effluent limitations: <b>NOV; 15 day response; Letter; Consent Order</b>			
Late reports: <b>Letter</b>			
Unpermitted discharges: <b>NOV depending on circumstance</b>			
Slug loads or spills: <b>Letter and NOV</b>			
<b>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)?</b>			
<b>Yes</b>			
<b>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.</b>			
<b>Name:</b>	<b>Type of Violation:</b>	<b>Enforcement Action:</b>	<b>Compliance Deadline:</b>
<b>Wastewater Solutions (2020)</b>	<b>Limits</b>	<b>8 NOVs; Letter</b>	<b>15 days</b>
<b>Grace Trailer (2020)</b>	<b>Limits</b>	<b>10 Letters</b>	<b>15 days</b>
<b>Quala Services, LLC (2021)</b>	<b>Limits</b>	<b>1 NOV</b>	<b>15 days</b>
<b>5. Comments on the POTW's enforcement procedures:</b>			
<b>Improvement since last inspection with consent order addition.</b>			

<b>F. POTW'S PRETREATMENT ORGANIZATION STRUCTURE</b>
1. Is the program structure essentially the same as that presented in the approved pretreatment program?
<b>Yes</b>
2. Are staffing levels adequate?
<b>Yes</b>
3. Are the responsible officials familiar with the approved program?
<b>Yes</b>
<b>G. MULTIJURISDICTIONAL ISSUES</b>
1. List any IUs which are located outside of the jurisdictional area of the POTW:
<b>N/A</b>
2. Does the POTW have adequate procedures for controlling IUs located outside its jurisdictional area?
<b>N/A</b>
3. Does the POTW have copies of permits for IUs in other cities?
<b>N/A</b>
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?
<b>N/A</b>
5. Comments on multijurisdictional issues:
<b>N/A</b>
<b>H. EVALUATION AND COMMENTS</b>
<b>See comments in individual sections.</b>

**PRETREATMENT COMPLIANCE INSPECTION  
IU SITE VISIT FORM**

Name of Industry: <b>Coca-Cola Bottling Company, Consolidated</b>
POTW Name: <b>West Memphis Utility Commission</b>
Industry Contacts: <b>Hank Bass</b>
Date and Time of Visit: <b>8/18/2021 13:50-14:00</b>
Description of Manufacturing Process: <b>Canning and bottling soda</b>
Sources of Process Wastewater: <b>Cleaning bottles and manufacturing soda</b>
Categorical Industry? <b>No</b>
Basis for Limits: <b>40 CFR and Local Sewer Use Ordinance</b>
Point of Application: <b>Prior to discharge to City</b>
Description of Pretreatment Equipment and Procedures: <b>pH adjustment with caustic soda</b>
Spill Prevention and Solvent Management Procedures: <b>Caustic soda monitored constantly with shut off valve</b>
Sampling Location and Equipment: <b>Composite sampler at the Parshall flume located near front gate after pretreatment equipment.</b>

**PRETREATMENT COMPLIANCE INSPECTION  
IU SITE VISIT FORM**

Name of Industry: <b>Quala Service, LLC</b>
POTW Name: <b>West Memphis Utility Commission</b>
Industry Contacts: <b>Sam Malone</b>
Date and Time of Visit: <b>8/18/2021 14:10-14:30</b>
Description of Manufacturing Process: <b>Internal and external truck washing. Washout of tankers used to haul various materials.</b>
Sources of Process Wastewater: <b>Internal and external truck washing</b>
Categorical Industry? <b>Yes, Transportation Equipment Cleaning</b>
Basis for Limits: <b>40 CFR and Local Sewer Use Ordinance</b>
Point of Application: <b>Prior to discharge to City</b>
Description of Pretreatment Equipment and Procedures: <b>Aeration, settling tanks, polymer/chemical addition, DAF (Polymer equipment not operational)</b>
Spill Prevention and Solvent Management Procedures: <b>Secondary containment around outdoor wastewater holding tank-evidence of overflow from tank with visibly high level.</b>
Sampling Location and Equipment: <b>Composite sampler at weir after pretreatment equipment. Sampling location is suitable for representative sampling, but may not provide adequate protection against tampering. Floating solids were observed prior to the weir indicating possible pass through. No discharge was observed at time of inspection.</b>

**PPETS CODE SHEET  
PRETREATMENT COMPLIANCE INSPECTION (PCI)**

		CODE
INSPECTOR'S NAME:	<u>Sarah Frasher</u>	
NAME OF FACILITY:	<u>West Memphis Utility Commission</u>	
PERMIT NUMBER USED TO TRACK PROGRAM:	<u>AR0022039</u>	NPID
DATE OF PCI:	<u>8/18/2021</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>6</u>	NOIN
SIUS WITHOUT CONTROL MECHANISM:	<u>0</u>	NOCM
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH STANDARDS OR REPORTING:	<u>1</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

## **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](http://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.

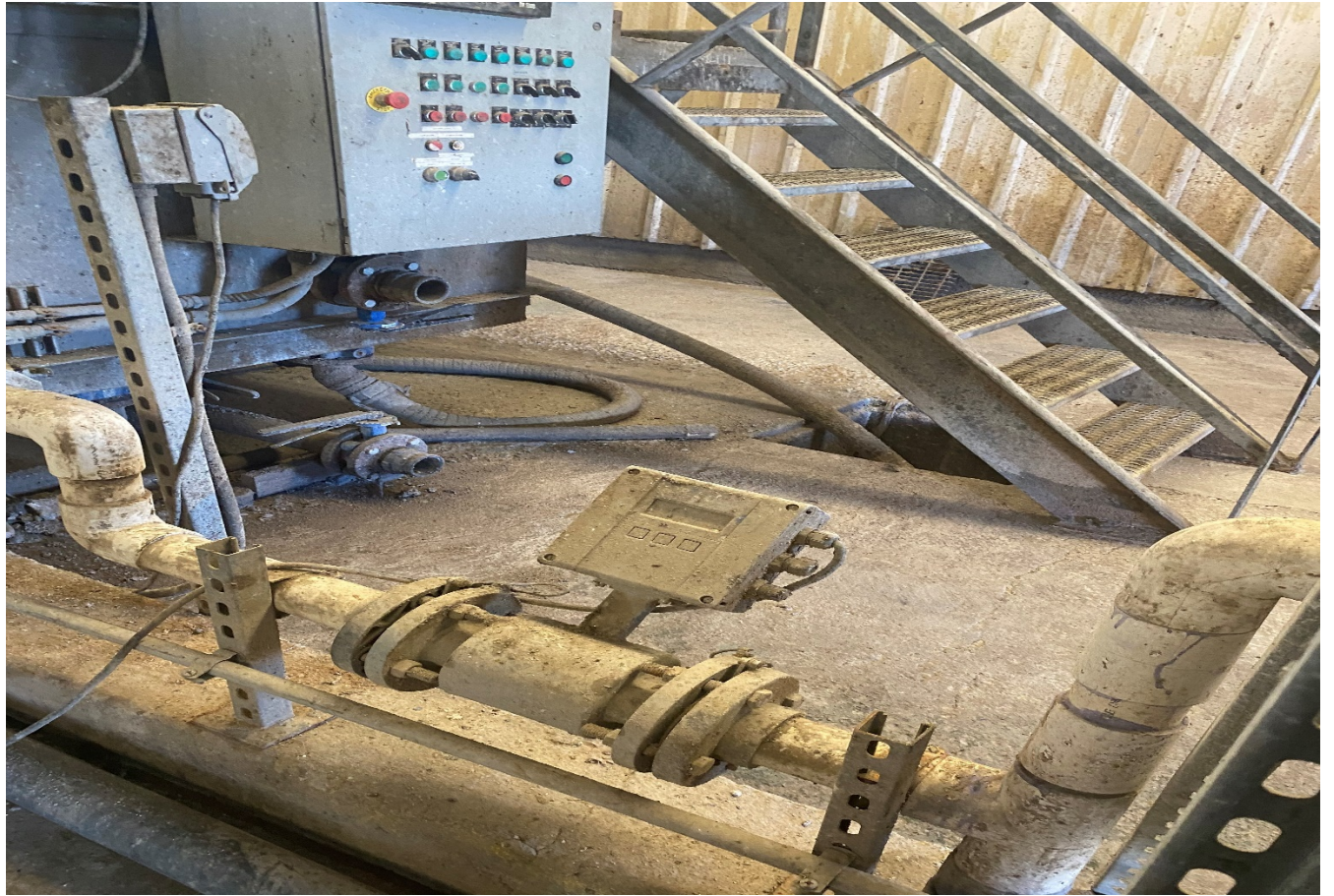
The sanitation department needs to come and cut the grass on a more frequent basis. I will make sure  
That the levee is cut more often.

Paul Holloway

A handwritten signature in black ink that reads 'Paul Holloway'. The signature is written in a cursive, flowing style.



















## 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**

**Denise Bosnick**  
Director of Environmental Quality

604 East Cooper  
P O Box 1868  
West Memphis, AR 72303

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Fax: 870-732-7623  
dbosnick@westmemphisar.gov

[www.westmemphisar.gov](http://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

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. All inspections will be done by May 1, 2022.

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 told 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