



March 13, 2024

Macro McClendon, Mayor West Memphis Utility Commission P.O. Box 1868 604 East Cooper West Memphis, AR 72301

Email Address: dwallace@westmempisar.gov

RE: West Memphis WWTP Inspection- PDS# 127177

AFIN: 18-00879 Permit No.: AR0022039

Dear Mayor McClendon:

On August 22, 2023, I performed a Compliance Evaluation 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.

No violations were noted at the time of the inspection. Please refer to the inspection report for any comments.

If I can be of any assistance please contact me at <u>Sarah.Frasher@adeq.state.ar.us</u> or 870-935-7221 ext.-15.

Sincerely,

Sarah Frasher

Inspector, Office of Water Quality

CC: Ward Wimbish, West Memphis Utilities, Assistant General Manager,

wwimbish@westmemphisar.gov

Paul Halloway, West Memphis Utilities, Director of Wastewater, pholloway@citywm.com

COUNTY: 18 Crittenden



ENVIRONMENTAL QUALITY

### OFFICE OF WATER QUALITY INSPECTION REPORT

PDS #: **127177** 

MEDIA: WN

AFIN: **18-00879** PERMIT #: **AR0022039** DATE: **8/22/2023** 

	'S LAT: <b>35.12421</b>	12 LONG: -90.179016 LOCATION: Entrance								
FACILITY INFORMAT	ΓΙΟΝ		INSPECTION INFORMATION							
West Memphis WWTP			FACILITY TYPE:  1 - Municipal	lunicipal 112347 S - State						
502 South Loop Road	FACILITY EVALUATION RATING: INSPECTION TYPE:  3 - Satisfactory Compliance Evaluation  DATE(S): ENTRY TIME: EXIT TIME:				ation					
West Memphis		TRY TIME <b>9:57</b>		12:3	9		ECTIVE DA	TE:		
RESPONSIBLE OFFI	CIAL	-	OIZZIZOZO O	J. J.		12.0	F		PIRATION DA	ATE:
Macro McClendon / Mayor							1	10/31/	2023	
COMPANY:			FAYETTEVILLE	SHA	LE I	REL/	TED: N			
West Memphis Utility Commission	FAYETTEVILLE SHALE VIOLATIONS: N									
MAILING ADDRESS:							•			
P.O. Box 1868 604 East Cooper			INSPECTION PARTICIPANTS  NAME/TITLE/PHONE/FAX/EMAIL/ETC:							
West Memphis AR 72301			Paul Halloway/ Director of Wastewater/							
PHONE & EXT: / FAX:			pholloway@citywm.com							
I										
EMAIL:										
dwallace@westmemphisar.gov CONTACTED DURING INSPECTION	· Na									
CONTACTED DURING INSPECTION	. NO		=							
(S=S	Satisfac		LUATIONS isfactory, N=Not Applicable/	Evaluate	ed)					
S PERMIT	S	FLOW MEASUR		N		STOR	MWATE	ER		
S RECORDS/REPORTS	S	LABORATORY		S	F	ACIL	ITY SIT	E RE	VIEW	
S OPERATION & MAINTENANCE	S	EFFLUENT/REG	CEIVING WATER	S	S	SELF.	-MONIT	ORIN	G PRC	GRAM
S SAMPLING	S	SLUDGE HAND	LING/DISPOSAL	N	l F	PRET	REATM	ENT		
N OTHER:	•	•								

#### **SUMMARY OF FINDINGS**

No violations were noted at the time of the inspection. Planned modifications of the plant will correct any aging and deterioration observed. Paul Halloway advised that treatment would not be interrupted during construction with only certain areas worked on at a time. Planned modifications are listed below.

#### **GENERAL COMMENTS**

Peracetic acid is currently being used for disinfection due the non-operational UV system that will soon be replaced during the planned modification work.

This facility is about to start modifications to the wastewater treatment that include:

- 1. Updating the headworks including grit chamber
- 2. Extending the aeration canals and improving the unused canals
- 3. Replacing the clarifiers
- 4. EQ basin dredged and new sumps added
- 5. Installing a new UV disinfection system
- 6. Installing area for septic waste disposal from West Memphis Utilities only

A Laboratory Audit Request Letter was given to the Wastewater Director, Paul Halloway, in which laboratory records were requested for evaluation. The following parameters are performed by the facility: BOD, TSS, DO, FCB, and pH.

Wayne Reynolds, DEQ Inspector, also participated in this inspection.

C/ fil	
INSPECTOR'S SIGNATURE: Sarah Frasher	DATE: 10/27/2023
SUPERVISOR'S SIGNATURE: Brest L. Walker	DATE: <b>3/6/2024</b>

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:	☑Y □N □NA □NE
4. ALL DISCHARGES ARE PERMITTED:	☑Y □N □NA □NE
SECTION B: RECORDKEEPING AND REPORTING EVALUATION	
RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT	☑S □M □U □NA □NE
DETAILS:	
ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS:	☑Y □N □NA □NE
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE:	⊠s □m □u □na □ne
a. DATES AND TIME(S) OF SAMPLING:	☑Y ☐N ☐NA ☐NE
b. EXACT LOCATION(S) OF SAMPLING:	☑Y ☐N ☐NA ☐NE
c. NAME OF INDIVIDUAL PERFORMING SAMPLING:	☑Y □N □NA □NE
d. ANALYTICAL METHODS AND TECHNIQUES:	☑Y □N □NA □NE
e. RESULTS OF CALIBRATIONS:	☑Y □N □NA □NE
f. RESULTS OF ANALYSES:	☑Y ☐N ☐NA ☐NE
g. DATES AND TIMES OF ANALYSES:	☑Y □N □NA □NE
h. NAME OF PERSON(S) PERFORMING ANALYSES:	☑Y □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:	
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 Øna □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:	□y □n ☑na □ne
14. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT:	□y Øn □na □ne
15. IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT:	□y □n ☑na □ne

SE	ECTION D: SAMPLING	
ΡE	ERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS	☑S □M □U □NA □NE
DE	ETAILS:	
1.	SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT:	☑Y □N □NA □NE
2.	LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES:	Øy □n □na □ne
3.	FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT:	Øy □n □na □ne
4.	SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT:	Øy □n □na □ne
5.	SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT:	Øy □n □na □ne
6.	SAMPLE COLLECTION PROCEDURES ADEQUATE:	☑Y □N □NA □NE
á	a. SAMPLES REFRIGERATED DURING COMPOSITING:	Øy □n □na □ne
ł	D. PROPER PRESERVATION TECHNIQUES USED:	Øy □n □na □ne
(	CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136:	Øy □n □na □ne
7.	IF MONITORING IS PERFORMED MORE OFTEN THAN REQUIRED ARE RESULTS REPORTED ON THE DMR:	Øy □n □na □ne
SE	ECTION E: FLOW MEASUREMENT	
PE	ERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS	☑S □M □U □NA □NE
DI	ETAILS:	
1.	PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: <u>Yes</u> TYPE OF DEVICE: <u>ISCO Sign</u> Flowmeter	ature ☑Y ☐N ☐NA ☐NE
2.	FLOW MEASURED AT EACH OUTFALL AS REQUIRED:	Øy □n □na □ne
3.	SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED:	Øy □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:	Øy □n □na □ne
7.	FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE:	Øy □n □na □ne
8.	FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES:	Øy □n □na □ne
9.	HEAD MEASURED AT PROPER LOCATION:	☑Y □N □NA □NE
SE	ECTION F: LABORATORY	
Ρŀ	ERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS	☑S □M □U □NA □NE
DI	ETAILS:	
1.	EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(B) FOR SLUDGES) :	☑Y □N □NA □NE
2.	IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED:	Øy □n □na □ne
3.	SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT:	☑Y □N □NA □NE
4.	QUALITY CONTROL PROCEDURES ADEQUATE:	⊠y □n □na □ne
5.	DUPLICATE SAMPLES ARE ANALYZED ≥10% OF THE TIME:	⊠y □n □na □ne
6.	SPIKED SAMPLES ARE ANALYZED ≥10% OF THE TIME:	☑Y □N □NA □NE
7.	COMMERCIAL LABORATORY USED:	☑Y □N □NA □NE
á	a. LAB NAME: Waypoint Analytical	
ł	D. LAB ADDRESS: Memphis, TN	
(	z. PARAMETERS PERFORMED: WET Testing, Total Phosphorus, Nitrate + Nitrite Nitrogen	
8.	BIOMONITORING PROCEDURES ADEQUATE:	ØY □N □NA □NE
a	a. PROPER ORGANISMS USED:	☑Y □N □NA □NE
k	p. PROPER DILUTION SERIES FOLLOWED:	☑Y □N □NA □NE
(	:. PROPER TEST METHODS AND DURATION:	☑Y □N □NA □NE
(	I. RETESTS AND/OR TRE PERFORMED AS REQUIRED:	Øy □n □na □ne

SECTION G	: EFFLUENT/R	ECEIVING WA	TERS OBSERV	ATIONS			
BASED ON	N VISUAL OBS	ERVATIONS (	ONLY			⊠S □M □	IU □NA □NE
DETAILS:					<b>'</b>		
OUTFALL #:	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	COLOR	OTHER
001	None	None	Low	None	None	Clear	
			1		1		<u> </u>
SECTION H	I: SLUDGE DIS	POSAL					
SLUDGE D	DISPOSAL ME	ETS PERMIT F	REQUIREMEN	TS		⊠S □M □	IU □NA □NE
DETAILS:							
1. SLUDGE M	IANAGEMENT ADEQU	ATE TO MAINTAIN EF	FLUENT QUALITY:			⊠s □m	□U □NA □NE
2. SLUDGE R	ECORDS MAINTAINED	AS REQUIRED BY 4	0 CFR 503:			⊠s □m	□U □NA □NE
3. FOR LAND	APPLIED SLUDGE, TY	PE OF LAND APPLIE	D TO: (E.G., FOREST	, AGRICULTURAL, PU	BLIC CONTACT SITE):		
SECTION I:	SAMPLING IN	SPECTION PRO	OCEDURES				
SAMPLE F	RESULTS WITH	IIN PERMIT R	EQUIREMENT	ΓS			IU ⊠NA □NE
DETAILS:					<b>'</b>		
1. SAMPLES	OBTAINED THIS INSPI	ECTION:				□Y	□n ☑na □ne
2. TYPE OF S	SAMPLE: GRAB:	COMPOSITE: I	METHOD: FREQUE	ENCY:			
	PRESERVED:					□Y	□N ☑NA □NE
4. FLOW PRO	PORTIONED SAMPLE	S OBTAINED:				□Y	□n ☑na □ne
5. SAMPLE O	BTAINED FROM FACIL	ITY'S SAMPLING DE	VICE:			□Y	□n ☑na □ne
6. SAMPLE R	EPRESENTATIVE OF	VOLUME AND NATUR	RE OF DISCHARGE:			□Y	□n ☑na □ne
7. SAMPLE S	PLIT WITH PERMITTEI	E:				□Y	□N ☑NA □NE
8. CHAIN-OF-	CUSTODY PROCEDU	RES EMPLOYED:				□Y	□N ☑NA □NE
9. SAMPLES	COLLECTED IN ACCO	RDANCE WITH PERM	IIT:			□Y	□N ☑NA □NE
SECTION J	: STORM WATI	ER POLLUTION	I PREVENTION	PLAN			
STORM W	ATER MANAG	EMENT MEET	S PERMIT RE	QUIREMENTS	3		IU ⊠NA □NE
DETAILS:					<u>.</u>		
1. SWPPP UF	PDATED AS NEEDED:_	_ DATE OF LAST UP	PDATE:			□Y	□n ☑na □ne
2. SITE MAP	INCLUDING ALL DISCH	HARGES AND SURFA	CE WATERS:			□Y	□n ☑na □ne
3. POLLUTIO	N PREVENTION TEAM	IDENTIFIED:				□Y	□n ☑na □ne
4. POLLUTIO	N PREVENTION TEAM	PROPERLY TRAINED	D:			□Y	□n ☑na □ne
5. LIST OF PO	OTENTIAL POLLUTANT	SOURCES:				□Y	□n ☑na □ne
6. LIST OF PO	OTENTIAL SOURCES A	AND PAST SPILLS AN	D LEAKS:			□Y	□n ☑na □ne
7. ALL NON-S	STORM WATER DISCH	ARGES ARE AUTHOR	RIZED:			□Y	□N ☑NA □NE
8. LIST OF ST	TRUCTURAL BMPS:					□Y	□n Øna □ne
9. LIST OF NO	ON-STRUCTURAL BMF	PS:				□Y	□n Øna □ne
10. BMPS PRC	PERLY OPERATED A	ND MAINTAINED:				□Y	□n Øna □ne
11. INSPECTIO	ONS CONDUCTED AS	REQUIRED:				□Y	□n Øna □ne
				<del></del>			<del></del>

#### **DMR Calculation Check**

Reporting Period:	From	2022	11	01	_ To	2022	11	30
		Year	Month	Day		Year	Month	Day
Parameter Checked:		TSS	_					
		Loading Mass				Concer Mon		
	Mo.	Avg Ibs/d	day	Mo. A	vg r		7-day Avg	J mg/l
Reported Value:		884			12.1		32	
Calculated Value:		884			12.1		32	
Permit Value:		1576.3			30.0		45.	0

If calculated value does not equal reported value, explain: <u>Equal</u>

#### **DMR Calculation Check**

Year         Month         Day         Year         Month         Day           Parameter Checked:         FCB         Concentration Monthly Month	Reporting Period:	From	2023	04	01	_ To	2023	04	30
Loading Concentration Mass Monthly Mo. Avg Ibs/day Mo. Avg mg/l 7-day Avg mg/l  Reported Value: N/A 42 295  Calculated Value: N/A 42 295			Year	Month	Day		Year	Month	Day
Loading Concentration Mass Monthly Mo. Avg Ibs/day Mo. Avg mg/l 7-day Avg mg/l  Reported Value: N/A 42 295  Calculated Value: N/A 42 295									
Mass Monthly Mo. Avg Ibs/day Mo. Avg mg/l 7-day Avg mg/l  Reported Value: N/A 42 295  Calculated Value: N/A 42 295	Parameter Checked:		FCB	_					
Mass Monthly Mo. Avg Ibs/day Mo. Avg mg/l 7-day Avg mg/l  Reported Value: N/A 42 295  Calculated Value: N/A 42 295									
Mass Monthly Mo. Avg Ibs/day Mo. Avg mg/l 7-day Avg mg/l  Reported Value: N/A 42 295  Calculated Value: N/A 42 295									
Mo. Avg Ibs/day         Mo. Avg mg/l         7-day Avg mg/l           Reported Value:         N/A         42         295           Calculated Value:         N/A         42         295			_						
Reported Value: N/A 42 295  Calculated Value: N/A 42 295			Mass				Mon	thly	
Calculated Value: N/A 42 295		Mo.	Avg Ibs/c	lay	Mo. A	vg r	mg/l	7-day Avg	J mg/l
Calculated Value: N/A 42 295									
	Reported Value:		N/A			42		295	5
Permit Value: N/A 1,000 2,000	Calculated Value:		N/A			42		295	5
Permit Value: N/A 1,000 2,000									
	Permit Value:		N/A		1	,000		2,00	0
If calculated value does not equal reported value, explain: <u>Equal</u>	If calculated value do	es not	equal repor	ted value, e	xplain:	<u>E</u>	<u>qual</u>		

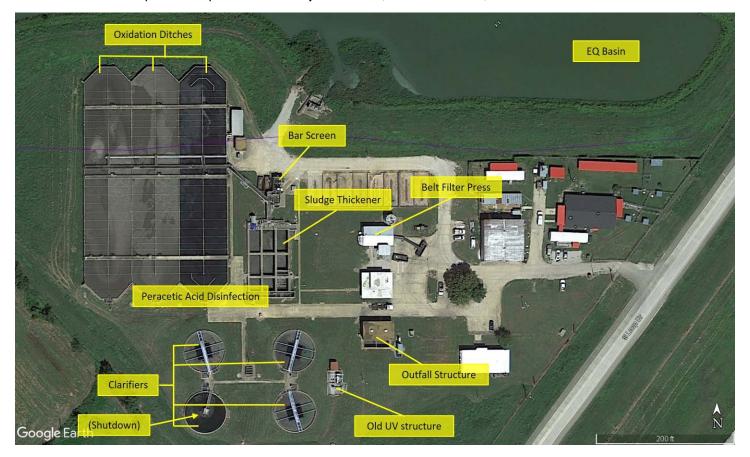


Figure 1. Google Earth image of West Memphis Utilities WWTP with labels for the different areas of treatment.

	Office of Water Quality Photographic Evidence Sheet							
Location: V	Vest	Memphis WWTP						
Photographe	er:	Sarah Frasher	Date:	8/22/2023	Time:	10:04		
Witness: W	Witness: Wayne Reynolds Photo #: 1							

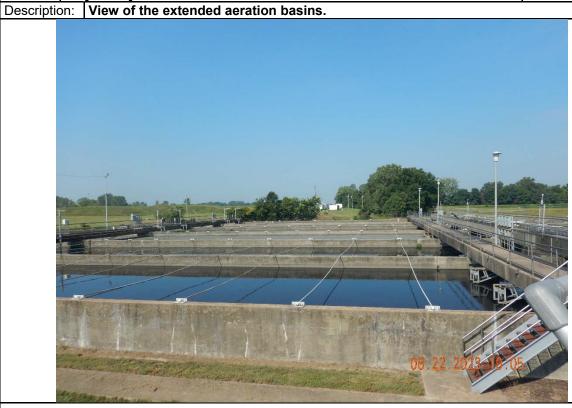


Photographer:Sarah FrasherDate:8/22/2023Time:10:33Witness:Wayne ReynoldsPhoto #:2





Office of Water Quality Photographic Evidence Sheet							
Location: West Memphis WWTP							
Photographer: Sarah Frasher	Date:	8/22/2023	Time:	10:05			
Witness: Wayne Reynolds Photo #: 3							



Photographer:   Sarah Frasher	Date:	8/22/2023	Time:	10:08
Witness: Wayne Reynolds			Photo #	: 4

Description: Close-up view of the extended aeration basin.



	Office of Water Quality Photographic Evidence Sheet							
Location:	Wes	st Memphis WWTP						
Photograp	her:	Sarah Frasher	Date:	8/22/2023	Time: 1	0:05		
Witness: \	Way	ne Reynolds			Photo #:	5		
Description	n: <b>\</b>	/iew of the sludge thickener.			_			

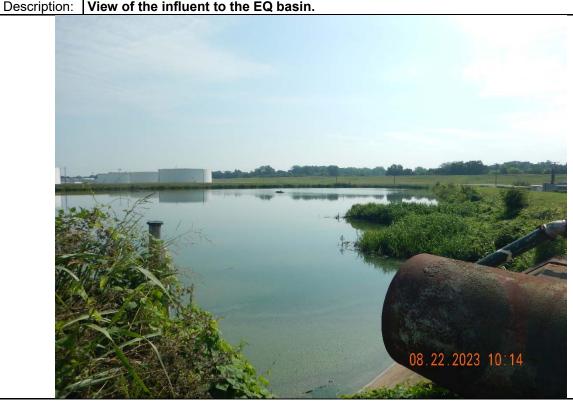


Photographer: Sarah Frasher Date: 8/22/2023 Time: 10:13 Witness: Wayne Reynolds
Description: View of the EQ Basin. Photo #: 6





	Office of Water Quality Photographic Evidence Sheet							
Location:	Wes	st Memphis WWTP						
Photograp	her:	Sarah Frasher	Date	:	8/22/2023	Time:	10:14	
Witness: \	Witness: Wayne Reynolds Photo #: 7							
Danamintian		/:£ 41 !£1 4 - 41	FO basin					



Photographer:Sarah FrasherDate:8/22/2023Time:10:16Witness:Wayne ReynoldsPhoto #:8







## Office of Water Quality Photographic Evidence SheetLocation:West Memphis WWTPPhotographer:Sarah FrasherDate:8/22/2023Time:10:24Witness:Wayne ReynoldsPhoto #:11

Description: View of the sludge of the working clarifier.



Photographer:Sarah FrasherDate:8/22/2023Time:10:26Witness:Wayne ReynoldsPhoto #:12

Description: View of the sludge intake for the clarifier. Note the overflow into the settling portion.



Office of Water Quality Photographic Evidence Sheet							
Location:	Wes	t Memphis WWTP					
Photograp	her:	Sarah Frasher	Date:	8/22/2023	Time:	10:30	
Witness: Wayne Reynolds Photo #: 1							

Description: View of the peracetic acid used for disinfection.



Photographer:	Sarah Frasher	Date:	8/22/2023	Time:	10:31
Witness: Wayr	ne Reynolds			Photo #:	14

Description: View of the unused UV disinfection.



# | Conting | Cont

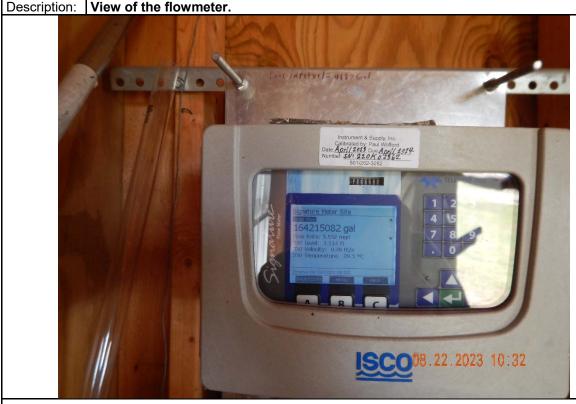


Photographer:Sarah FrasherDate:8/22/2023Time:10:31Witness:Wayne ReynoldsPhoto #:16

Description: View of the ISCO sampler.



Office of Water Quality Photographic Evidence Sheet							
Location: West Memphis WWTP							
Photograp	her:	Sarah Frasher	Date:	8/22/2023	Time:	10:32	
Witness: \	Witness: Wayne Reynolds Photo #: 17						
Description   Manual the Bassactus							



Photographer:Sarah FrasherDate:8/22/2023Time:10:32Witness:Wayne ReynoldsPhoto #:18

Description: View of the outfall structure.



Office of Water Quality Photographic Evidence Sheet								
Location:	Location: West Memphis WWTP							
Photographer: Sarah Frasher		Da	te:	8/22/2023		Time:	10:39	
Witness: Wayne Reynolds Photo #:						±: 19		
Description	: V	iew of the belt filter press.						



Photographer: Sarah Frasher	Date:	8/22/2023	Time:	10:39
Witness: Wayne Reynolds			Photo #	20

Description: Close-up view of the belt filter press.



	Office of W	ater Quality Photo	graphic Evidence Sheet	
Location: V	lest Memphis WWTP			
Photographe			Date: 8/22/2023	Time: 10:39
	ayne Reynolds			Photo #: 21
Description:	View of the roll off of	lumpster for the s	udge from the belt filter p	oress.