

Lawrence, Myrl

To: mayorsanders@sbcglobal.net
Cc: gcarrblyww@gmail.com; Brad Wingfield
Subject: Violations identified during Compliance Review June 1, 2019 through October 31, 2019



December 18, 2019

Honorable James Sanders
Mayor, City of Blytheville
P.O. Box 1784
Blytheville, AR 72316

RE: Permit Numbers: AR0022578 - South, AR0022560 - West, and AR0022586 - North
Effluent Limit Permit Violations from June 2019 through October 2019

Dear Mayor Sanders,

A review of the Permit file for the above mentioned facilities for the period of June 1, 2019 through October 31, 2019 has revealed the following compliance issues:

Permit No: AR0022578 - South has reported **12 effluent limit violations** of the Permit:

- One (1) violation of Mercury, total recoverable; and
- Eleven (11) violations of Nitrogen, ammonia total [as N].

Permit No: AR0022560 - West has reported **23 effluent limit violations** of the Permit:

- One (1) violation of Mercury, total recoverable;
- Seven (7) violations of Coliform, fecal general; and
- Fifteen (15) violations of Nitrogen, ammonia total [as N].
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Permit No: AR0022586 –North has reported **14 effluent limit violations** of the Permit:

- Seven (7) violations of Mercury, total recoverable; and
- Seven (7) violations of Nitrogen, ammonia total [as N].

Permit No: AR0022578 - South also did not complete Whole Effluent Toxicity testing as required by the Permit during the July – September reporting period.

Permit No: AR0022560 – West was also identified during this period by DEQ’s permitting review process as having failed to comply with the Pretreatment requirements of the Permit. The permittee Failed to Meet the Inspection and Sampling Plan for SIUs (B0016) for the 2017 reporting year.

Non-compliance reports with corrective actions were received by the Division, and complete summaries of the violations detailing the associated reporting periods are enclosed. During this period, the facilities have reported continuing to implement actions within the Corrective Action Plan submitted by the City on March 8, 2019. Every effort should continue to be made to reduce or eliminate these ongoing violations in the interim until the new facility is completed.

As a reminder, any violation of your Permit is subject to further enforcement action by this Department, pursuant to the Arkansas Water and Air Pollution Control Act. The regulations and your Permit require that you take all reasonable measures necessary to eliminate or prevent the occurrence of violations.

Should you have questions or desire further assistance please contact the undersigned directly.

Kindest Regards,



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Gary Carr, City of Blytheville, gcarrblyww@gmail.com

AR0022578 - BLYTHEVILLE, CITY OF-SOUTH WWTF

DMR End Date	Disch-Desig	Parameter Desc	Reported DMR Value	Limit Value	Vio %	DMR Value Type Code	Parameter Code
06/30/2019	001-A	Nitrogen, ammonia total [as N] (MO AVG, lb/d)	51.6	23	124%	Q1	00610-1-0
06/30/2019	001-A	Nitrogen, ammonia total [as N] (MO AVG, mg/L)	8.2	2	310%	C2	00610-1-0
06/30/2019	001-A	Nitrogen, ammonia total [as N] (7 DA AVG, mg/L)	10.3	3	243%	C3	00610-1-0
08/31/2019	001-A	Nitrogen, ammonia total [as N] (MO AVG, mg/L)	2.6	2	30%	C2	00610-1-0
08/31/2019	001-A	Nitrogen, ammonia total [as N] (7 DA AVG, mg/L)	4.7	3	57%	C3	00610-1-0
08/31/2019	001-A	Mercury, total recoverable (MO AVG, ug/L)	0.0178	.013	37%	C2	71901-1-0
09/30/2019	001-A	Nitrogen, ammonia total [as N] (MO AVG, lb/d)	26.8	23	17%	Q1	00610-1-0
09/30/2019	001-A	Nitrogen, ammonia total [as N] (MO AVG, mg/L)	5.9	2	195%	C2	00610-1-0
09/30/2019	001-A	Nitrogen, ammonia total [as N] (7 DA AVG, mg/L)	8.4	3	180%	C3	00610-1-0
10/31/2019	001-A	Nitrogen, ammonia total [as N] (MO AVG, lb/d)	44.7	23	94%	Q1	00610-1-0
10/31/2019	001-A	Nitrogen, ammonia total [as N] (MO AVG, mg/L)	6.3	2	215%	C2	00610-1-0
10/31/2019	001-A	Nitrogen, ammonia total [as N] (7 DA AVG, mg/L)	8.4	3	180%	C3	00610-1-0

AR0022560 - BLYTHEVILLE, CITY OF-WEST WWTF (47-00544)

DMR End Date	Disch-Desig	Parameter Desc	Reported DMR Value	Limit Value	Vio %	DMR Value Type Code	Parameter Code
06/30/2019	001-A	Nitrogen, ammonia total [as N] (MO AVG, lb/d)	37.3	35	7%	Q1	00610-1-0
06/30/2019	001-A	Nitrogen, ammonia total [as N] (MO AVG, mg/L)	11.3	2.8	304%	C2	00610-1-0
06/30/2019	001-A	Nitrogen, ammonia total [as N] (7 DA AVG, mg/L)	11.5	5	130%	C3	00610-1-0
07/31/2019	001-A	Nitrogen, ammonia total [as N] (MO AVG, lb/d)	35.7	35	2%	Q1	00610-1-0
07/31/2019	001-A	Nitrogen, ammonia total [as N] (MO AVG, mg/L)	4.3	2.8	54%	C2	00610-1-0
07/31/2019	001-A	Nitrogen, ammonia total [as N] (7 DA AVG, mg/L)	9.9	5	98%	C3	00610-1-0
07/31/2019	001-A	Coliform, fecal general (30DA GEO, #/100mL)	204	200	2%	C2	74055-1-0
07/31/2019	001-A	Coliform, fecal general (7 DA GEO, #/100mL)	1415	400	254%	C3	74055-1-0
08/31/2019	001-A	Nitrogen, ammonia total [as N] (MO AVG, mg/L)	5.7	2.8	104%	C2	00610-1-0
08/31/2019	001-A	Nitrogen, ammonia total [as N] (7 DA AVG, mg/L)	15.2	5	204%	C3	00610-1-0
08/31/2019	001-A	Coliform, fecal general (7 DA GEO, #/100mL)	780	400	95%	C3	74055-1-0
09/30/2019	001-A	Nitrogen, ammonia total [as N] (MO AVG, mg/L)	17.4	2.8	521%	C2	00610-1-0
09/30/2019	001-A	Nitrogen, ammonia total [as N] (7 DA AVG, mg/L)	19.6	5	292%	C3	00610-1-0
09/30/2019	001-A	Coliform, fecal general (30DA GEO, #/100mL)	1001	200	401%	C2	74055-1-0
09/30/2019	001-A	Coliform, fecal general (7 DA GEO, #/100mL)	1658	400	315%	C3	74055-1-0
10/31/2019	001-A	Nitrogen, ammonia total [as N] (MO AVG, mg/L)	5	2.8	79%	C2	00610-1-0
10/31/2019	001-A	Nitrogen, ammonia total [as N] (7 DA AVG, mg/L)	9.4	5	88%	C3	00610-1-0
11/30/2019	001-A	Nitrogen, ammonia total [as N] (MO AVG, lb/d)	67.9	38	79%	Q1	00610-1-1
11/30/2019	001-A	Nitrogen, ammonia total [as N] (MO AVG, mg/L)	11	3	267%	C2	00610-1-1
11/30/2019	001-A	Nitrogen, ammonia total [as N] (7 DA AVG, mg/L)	14.13	4.5	214%	C3	00610-1-1
11/30/2019	001-A	Mercury, total recoverable (MO AVG, ug/L)	0.0407	.0328	24%	C2	71901-1-0
11/30/2019	001-A	Coliform, fecal general (30DA GEO, #/100mL)	1829	1000	83%	C2	74055-1-1
11/30/2019	001-A	Coliform, fecal general (7 DA GEO, #/100mL)	2260	2000	13%	C3	74055-1-1

AR0022586 - BLYTHEVILLE, CITY OF - NORTH TREATMENT FACILITY (47-00929)

1/1

DMR End Date	Disch-Desig	Parameter Desc	Reported DMR Value	Limit Value	Vio %	DMR Value Type Code	Parameter Code
06/30/2019	001-A	Nitrogen, ammonia total [as N] (MO AVG, lb/d)	21.6	13	66%	Q1	00610-1-0
06/30/2019	001-A	Nitrogen, ammonia total [as N] (MO AVG, mg/L)	6.9	2	245%	C2	00610-1-0
06/30/2019	001-A	Nitrogen, ammonia total [as N] (7 DA AVG, mg/L)	12.4	3	313%	C3	00610-1-0
07/31/2019	001-A	Nitrogen, ammonia total [as N] (MO AVG, lb/d)	13.3	13	2%	Q1	00610-1-0
07/31/2019	001-A	Nitrogen, ammonia total [as N] (MO AVG, mg/L)	4.6	2	130%	C2	00610-1-0
07/31/2019	001-A	Nitrogen, ammonia total [as N] (7 DA AVG, mg/L)	4.8	3	60%	C3	00610-1-0
08/31/2019	001-A	Mercury, total recoverable (MO AVG, lb/d)	0.00013	.0001	32%	Q1	71901-1-0
08/31/2019	001-A	Mercury, total recoverable (MO AVG, ug/L)	0.058	.0134	333%	C2	71901-1-0
08/31/2019	001-A	Mercury, total recoverable (7 DA AVG, ug/L)	0.058	.0269	116%	C3	71901-1-0
09/30/2019	001-A	Mercury, total recoverable (MO AVG, ug/L)	0.0183	.0134	37%	C2	71901-1-0
10/31/2019	001-A	Nitrogen, ammonia total [as N] (MO AVG, mg/L)	2.1	2	5%	C2	00610-1-0
10/31/2019	001-A	Mercury, total recoverable (MO AVG, ug/L)	0.0272	.0134	103%	C2	71901-1-0
10/31/2019	001-A	Mercury, total recoverable (7 DA AVG, ug/L)	0.0272	.0269	1%	C3	71901-1-0
11/30/2019	001-A	Mercury, total recoverable (MO AVG, ug/L)	0.0245	.0134	83%	C2	71901-1-0