United States Environmental Protection Agency

Region 6 Compliance Assurance and Enforcement Division

INSPECTION REPORT

Inspection Date(s):	December 7, 2017		
Media:	Water		
Regulatory Program(s)	NPDES		
Company Name:	**City of De Queen**		
Facility Name:	**City of De Queen Wastewater Treatment Plant**		
Facility Physical Location:	670 S. 9th St		
(city, state, zip code)	De Queen, AR 71832		
Mailing address:	670 S. 9th St		
(city, state, zip code)	De Queen, AR 71832		
County/Parish:	Sevier County		
Facility Contact:	Mike Sims	Wastewater Manager	
	msims@cityofdequeen.com		
FRS Number:	110064254024		
Identification/Permit Number:	AR0021733		
Media Number:	none		
NAICS:	221320		
SIC:	4952		
Personnel participating in inspection:			
Magda Dallemagne	US EPA, 6EN-WS	Inspector	(214) 665-7396
Mike Sims	Facility Representative	Wastewater Manager	(870) 642-5231
Daniel Lindsey	Facility Representative	Operator	(870) 642-5231
Tim Kimmel	Facility Representative	Operator	(870) 642-5231
EPA Lead Inspector Signature/Date	Magda Dallemagne	2-6-2018 Date	
Supervisor Signature/Date	Esteban Herrera for Robert Houston	2/6/2018 Date	

6ENFORM-019-R7 (2/15/2017)

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspector Magda Dallemagne arrived at the City of De Queen Wastewater Treatment Plant (WWTP) (the Facility) at 9:30 am on December 7, 2017, for an unannounced inspection. I met with Mike Sims, Wastewater Manager, Daniel Lindsey, Operator, and Tim Kimmel, Operator. I presented my credentials to Mr. Sims informing him that this was an EPA inspection to determine compliance with the facility's National Pollution Discharge Elimination System (NPDES) permit, AR0021733. The scope of the inspection was to evaluate the compliance of the facility's laboratory and sampling with its NPDES operating permit.

FACILITY DESCRIPTION

The Facility laboratory is not accredited under State, National, or Private programs. There is one supervising technician and two alternating laboratory technicians who are responsible for sampling and testing analytes. The laboratory performs pH, dissolved oxygen (DO), 5 Day Carbonaceous Biological Oxygen Demand ($CBOD_5$), Total Suspended Solids (TSS), Ammonia, Fecal Coliform (Fecal), Chlorine, and Nitrate testing under their NPDES operating permit. The remaining required testing is sampled on site and sent to a contract laboratory, Arkansas Analytical Inc., to satisfy the permit requirements.

Section II - OBSERVATIONS

The inspector discussed the operations and management of the laboratory and observed as the technician walked them through the processes for testing and sampling per the NPDES permit.

The following observations were made.

1. Internal training is not formally tracked, and performance reviews are not documented.
2. The standards and reagents were not labeled with the open and expiration dates. The expiration dates used did not meet the general one year after opening, or per manufacturer's expiration, rule.
3. While the instruments and equipment used in the lab underwent semi regular maintenance, the maintenance was not recorded.
4. The weights used for regular calibration of the mass balance do not have National Institute of Standards and Technology (NIST) certification.
5. Thermometers are not traceable to a NIST certification. The thermometers were labeled with their last check or calibration, but were not labeled with their correction factor. The last check or calibration performed on the thermometers was 2011, working thermometers are to be checked yearly against a NIST certified thermometer. There is also no tracking maintained for the thermometer check.

6. Standard Operating Procedures (SOP) were written for some methods in the laboratory, other methods were understood. The SOPs that are written are not in a controlled format, do not reference the correct EPA method, and are not updated regularly. All understood methods should be recorded into a written format.
7. The bench sheets are not properly maintained, as detailed below.
   a. Bench sheets do not reference the EPA method
   b. Bench sheets referenced out of date Standard Methods
   c. Automatic signatures are used on the bench sheets
   d. Some columns in the bench sheet tables are not properly labeled
   e. Correct units for all data entries are not properly labeled
8. An unacceptable means to measure volume was used in the testing for $CBOD_5$. The technicians are using syringes with no class or certificate of measurement in place of equipment with a class A or B certificate.
9. The technicians were seen to regularly omit the use of gloves and eat in the laboratory.
10. From the data provided for review, the temperature controlled instruments and equipment have a temperature log which was not maintained regularly from April 25, 2017, to December 7, 2017, as detailed below.
    a. The log does not demonstrate regular entries on either a weekly or daily basis
    b. A once weekly entry appears most often, though these entries do not appear to be performed on a specific day of the week
    c. The log shows some entries for multiple days in a week, but was not maintained throughout the log
    d. Three entries were made in the month of August
    e. No log entries are found for the month of October
    f. One entry was made in the month of November
    g. One entry was made in the month of December
11. The calculations performed for $CBOD_5$ are incorrect. Where specifically the calculations must be updated to correctly follow the EPA method will be investigated further.
12. From the data provided for review, there were several cases found in which the quality control samples invalidated the data though it does not appear the laboratory recorded or noted the invalidation of the data. The impact of the invalidation of data on the reporting numbers for the Facility must be further investigated.

Section III – AREAS OF CONCERN

At the conclusion of the inspection, the EPA inspector met with the representatives from the Facility for an exit interview at 2:24 pm December 7, 2017. At that time, the inspector provided details of the inspection and reviewed areas of concern noted in the inspection that will require additional follow-up or correction. These areas of concern included:

1. Tracking of personnel training and performance reviews
2. Inadequate and inconsistent maintenance and/or operation of equipment and instruments
3. Inadequate application of quality control standards
4. Improper calculations used
5. Maintenance of SOPs and bench sheets

Section IV – FOLLOW UP

As per the document request placed during the inspection by the inspector, documents were received by EPA on December 14, 2017, after exiting the Facility on December 7, 2017. A copy of this report will be sent to the facility.