



REGION 4

ATLANTA, GA 30303

May 1, 2024

The Honorable Rod Bobo
Mayor
City of West Point
580 Commerce Street
West Point, Mississippi 39773
rbobo@wpnet.org

Dear Mayor Rod Bobo:

The U.S. Environmental Protection Agency, Region 4 conducted a Compliance Evaluation Inspection (CEI) on the City of West Point Wastewater Treatment Plant (WWTP) on February 22, 2024. The objective of the inspection was to assess the City of West Point compliance with the Clean Water Act and the National Pollutant Discharge Elimination System permit, and to evaluate the general condition of the WWTP. The inspection results have been summarized in the enclosed CEI Report.

If you have specific questions about the inspection report, please contact Mr. Brad Ammons at ammons.brad@epa.gov. Please verify receipt of this letter and report by emailing Mr. Ammons at the email address provided.

Sincerely,

**JAIRO
CASTILLO**

Jairo Castillo, P.E., Chief
Wastewater Enforcement Section
Water Enforcement Branch

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CASTILLO
Date: 2024.05.01
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ENCLOSURES

1. West Point MS POTW CV-MS0020788-02222024.docx

cc: James Gammill
Mississippi Department of Environmental Quality
jgammill@mdeq.ms.gov

Shawn Doss
Chief Wastewater Operator, City of West Point
sdoss@wpnet.org

United States Environmental Protection Agency Region 4

Enforcement and Compliance Assurance Division

Water Enforcement Branch

61 Forsyth Street, SW

Atlanta, Georgia 30303



Compliance Evaluation Inspection Report

West Point POTW

4805 Old Tibbee Road

West Point, MS 39773

NPDES Permit Number: MS0020788

Project No. CV-MS0020788-02222024

Date of Inspection:

February 22, 2024

Inspectors:

Brad Ammons, EPA Region 4

Andrew Gunderson, EPA Region 4

Mel-Chilecee Taylor, EPA Region 4

James Gammill, MDEQ

Justin Berry, MDEQ

Inspection Report Prepared by:

Brad Ammons

Title and Approval Sheet

Title: West Point MS POTW CV-MS0020788-02222024.docx
Project No. CV-MS0020788-02222024

Approving Official:

JAIRO
CASTILLO

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Jairo Castillo, P.E., Chief
Wastewater Enforcement Section
Water Enforcement Branch

Enforcement Officer:

MICHAEL AMMONS

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Brad Ammons, Environmental Engineer
Wastewater Enforcement Section
Water Enforcement Branch

COMPLIANCE EVALUATION INSPECTION REPORT
West Point MS WWTP, Project # CV-MS0020788-02222024

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1. Introduction

On February 22, 2024, representatives of the United States Environmental Protection Agency, Region 4 and the Mississippi Department of Environmental Quality (MDEQ) conducted a Compliance Evaluation Inspection (CEI) on the City of West Point Wastewater Treatment Plant (WWTP), owned and operated by the City of West Point, Mississippi (West Point/The City). The inspection was conducted under the authority of Section 308 of the Clean Water Act (CWA), as amended. This report provides a summary of the inspection.

2. Participants

Name	Organization	Contact Information
Brad Ammons	EPA Region 4 (Lead Inspector)	Ammons.Brad@epa.gov
Andrew Gunderson	EPA Region 4	Gunderson.Andrew@epa.gov
Mel-Chilecee Taylor	EPA Region 4	Taylor.Melchilecee@epa.gov
James Gammill	MDEQ	jgammill@mdeq.ms.gov
Justin Berry	MDEQ	jberry@mdeq.ms.gov
Shawn Doss	City of West Point	sdoss@wpnet.org
Randy Jones	City of West Point	rjones@wpnet.org
Stanley Spradling	Neel-Schaffer	Stanley.spradling@neel-schaffer.com

3. Facility Description

The West Point WWTP is an activated sludge wastewater treatment plant located at 4805 Old Tibbee Road in West Point, MS. The facility is currently permitted under NPDES permit number MS0020788 to discharge 3.5 million gallons per day (MGD) from outfall 001 to an unnamed tributary of Tibbee Creek.

The WWTP consists of headworks (bar screen and grit removal) off-site at the 9-acre lagoon south of the WWTP, a single Schriber traveling bridge aeration basin, two secondary clarifiers, return activated sludge pumps, waste activated sludge pumps, ultraviolet (UV) disinfection, and related appurtenances. In addition, there are three old aeration basins on-site and two lagoons (9 acres and 40 acres, respectively) which can serve as equalization. The City receives flow from two significant industrial users, Yokohama Tire and Pico Foods (Chicken processor).

The facility's current wastewater plant operational staff are as follows:

- One Mississippi Wastewater Treatment Class 4 Operator;
- One Mississippi Wastewater Treatment Class 2 Operator;
- One Service Worker.



Figure 1. Aerial View of Facility.

4. Inspection Procedures.

The overall objective of this CEI was to evaluate the condition and operational performance of the WWTP and West Point's self-monitoring program and to offer compliance assistance as needed. Specific tasks included conducting an opening conference, interviewing City staff and City contractors that were on-site, reviewing WWTP laboratory and Discharge Monitoring Report (DMR) records, conducting a site visit throughout the existing WWTP, and a closing conference.

5. Findings & Conclusions

A. Permit Review

West Point's NPDES permit for the WWTP has an effective date of June 6, 2022, and expires on May 31, 2027. The NPDES permit lists and describes the outfall as Outfall 001 (Treated Domestic Wastewater) to an unnamed tributary of Tibbee Creek.

The NPDES permit contains Effluent Limitations and Monitoring Requirements table for Outfall 001 at the WWTP's current capacity of 3.5 MGD.

B. Records and Reports

The EPA's Enforcement Compliance History Online (ECHO) shows that the WWTP was in Non-Compliance (NC) or Significant Non-Compliance (SNC) for effluent limit exceedances as listed:

- Biochemical Oxygen Demand, 5-day (BOD₅, Monthly Avg.) – exceeded 4 of the last 13 quarters.
- BOD₅, Weekly Avg. – exceeded 5 of the last 13 quarters.
- BOD₅ % Removal – exceeded 1 of the last 13 quarters.
- Total Residual Chlorine (Monthly Avg.) – exceeded 1 of the last 13 quarters.
- Total Residual Chlorine (Weekly Avg.) – exceeded 1 of the last 13 quarters.
- E. coli – exceeded 2 of the last 13 quarters.
- Flow (Monthly Avg.) – exceeded 2 of the last 13 quarters.
- Nitrogen Ammonia Total (Monthly Avg.) - exceeded 2 the last 13 quarters.
- Nitrogen Ammonia Total (Weekly Avg.) – exceeded 4 of the last 13 quarters.
- Dissolved Oxygen – exceeded 3 of the last 13 quarters.
- Total Suspended Solids (Monthly Avg.) – exceeded 2 of the last 13 quarters.
- Total Suspended Solids (Weekly Avg.) – exceeded 2 of the last 13 quarters.
- Total Suspended Solids Percent Removal - exceeded 3 the last 13 quarters.

The August 2023 Discharge Monitoring Report (DMR) and analytical results from the onsite laboratory were reviewed. All reviewed paperwork, including the analytical results, chain of custody, and DMR met permit required retention times and was well organized. In addition, Mr. Doss had a copy of the City's NPDES permit.

C. Flow Measurement

Influent flow at the time of the opening conference was approximately 2.8 MGD. Effluent flow was observed to be 2.87 MGD.

D. Sampling/Laboratory

Mr. Doss samples/analyzes all the field parameters for the City (pH, Dissolved Oxygen and Residual Chlorine when chlorine is used). The City analyzes all parameters in house except for BOD₅, Total Nitrogen and Total Phosphorus, which are analyzed by the City's contract laboratory (Waypoint Analytical in Ridgeland, MS). The following equipment/observations were noted in the laboratory:

- All pH buffers were noted to be in date.
- Ritter autoclave (for E. Coli).
- Hach DR-3000 (for Ammonia-Nitrogen).
- Hach HQ440d multimeter (for pH/Temperature/Dissolved Oxygen).
- NC Labs (for Total Suspended Solids) – calibrated 2/22/2023.

E. Site Visit (Operation and Maintenance)

A WWTP site visit started at the traveling bridge aeration basin, as the headworks are off-site at the 9-acre lagoon. The Dissolved Oxygen level in the basin read 2.27 mg/L. The onsite visit continued from the aeration basin, through the secondary clarifiers and ended at the Ultraviolet (UV) chamber. Then, the party drove to the outfall/headworks area at the 9 acre lagoon, where the above mentioned flow measurement was noted (2.87 MGD). The following components were observed:

- The influent auto sampler thermometer read 5° Celsius.
- The grit removal system was operational (Photo 6).
- Traveling bridge aeration basin appeared well mixed (Photo 1).
- Secondary clarifier #2 (Photos 2 and 3) and secondary clarifier #1 (Photo 4) had algae on the weirs even though Mr. Doss stated that the City had cleaned them the day prior.
- The UV system was operational, so no chlorine was being used (Photo 5).

F. Sludge Handling

Wasted sludge is stored in one of the off-site lagoons.

G. Effluent/Receiving Water

Outfall 001 effluent appeared to be clear and void of solids. The receiving waterbody (unnamed tributary to Tibbee Creek) was not accessible on-site.

6. Discussion

The West Point WWTP is operating with a lot of backup treatment capacity with the off-site lagoons. Most of the effluent limit violations are likely tied to peak flow during and shortly after rainfall events.

END OF REPORT



Photo 1: Circular traveling bridge aeration basin.



Photo 2: Secondary clarifier #2.



Photo 3: Clarifier #2 (note algae on weirs).



Photo 4: Clarifier #1.



Photo 5: UV disinfection system.



Photo 6: Headworks (grit chamber on left).