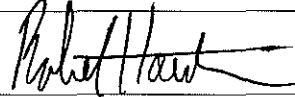


**Region 6 Compliance Assurance and Enforcement Division
INSPECTION REPORT**

Inspection Date(s):	November 30, 2017		
Media:	Water		
Regulatory Program(s)	NPDES		
Company Name:	City of Blytheville		
Facility Name:	City of Blytheville Sewer Commission		
Facility Physical Location:	4834 N Co Rd 639		
(city, state, zip code)	Blytheville, AR 72315		
Mailing address:	P.O. Box 1784		
(city, state, zip code)	Blytheville, AR 72315		
County/Parish:	Mississippi		
Facility Contact:	Thomas Jones	Pretreatment Coordinator	
	tdjblyww@gmail.com		
FRS Number:	110033164625		
Identification/Permit Number:	AR0022560		
Media Number:	None		
NAICS:	221320		
SIC:	4952		
Personnel participating in inspection:			
Magda Dallemagne	US EPA, 6EN-WS	Inspector	(214) 665-7396
Thomas Jones	Facility Representative	Pretreatment Coordinator	(870) 763-4961
Roger Ray	Facility Representative	Lab Technician	(870) 763-4961
Gary Carr	Facility Representative	Waste Treatment Director	(870) 780-5885
EPA Lead Inspector Signature/Date	 Magda Dallemagne		1-29-2418 Date
Supervisor Signature/Date	 Robert Houston		1/29/2018 Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspector Magda Dallemagne arrived at the City of Blytheville Sewer Commission (the Facility) at 8:25 am on November 30, 2017, for an unannounced inspection. I met with Thomas Jones, Pretreatment Coordinator, and Roger Ray, Lab Technician. I presented my credentials to Mr. Jones informing him that this was an EPA inspection to determine compliance with the facility's National Pollution Discharge Elimination System (NPDES) permit, AR0022560. The scope of the inspection is 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 Lab Technician, who is supervised and sometimes assisted by the Pretreatment Coordinator. The laboratory performs pH, dissolved oxygen (DO), 5 Day Carbonaceous Biochemical Oxygen Demand (CBOD₅), Total Suspended Solids (TSS), Ammonia, and Fecal Coliform (Fecal) testing under their NPDES operating permit, the remaining required testing is sampled on site and sent to a contract laboratory, Way Point Analytical, 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 as per the NPDES permit.

The following observations were made.

1. Internal training is not formally tracked, and the semi-regular performance review is not recorded.
2. The expiration dates on the reagents and standards were not clearly labeled, and did not meet the general one year after opening, or as per manufacturer's expiration, rule. One pH buffer solution had expired in September of 2016.
3. The method used for calibrating the pH meter is incorrect. The method requires a three (3) point calibration, whereas the technician is only using two (2) points for calibration. Additionally, the field calibration bench sheet indicates additional issues with the calibration as the differences between the meter reading and the known buffer pH is greater than 0.1 pH standard units.
4. The probe for CBOD₅ measurements was stored such that the tip was submersed in water, it should be stored in a bottle with plenty of head space between water level and probe. The pH probe was also wiped off before each use during sample reading, this can damage the probe, it was suggested the technician flick or shake any excess liquid off the probe instead.

5. The method used for measuring TSS is incorrect. The technician is drying the samples in an oven only once before recording the weight of solid. It is required that TSS samples be dried two or more times, or until the difference in mass after each drying period is less than 0.005g.
6. The balance was placed on a table that did not seem very stable, it was suggested the laboratory stabilize it. The weights used for balance calibration are not National Institute of Standards and Technology (NIST) certified.
7. Thermometers were not labeled with calibration, expiration, and correction factors. After reviewing the NIST Traceable calibration certificates provided for the thermometers, it was discovered one thermometer passed its calibration expiration date.
8. Several thermometers were not held suspended in containers such that the thermometers were touching the inside surface of its container. Temperature readings can be affected if the thermometer is touching surfaces such as glass or metal, and so must be suspended.
9. Standard Operating Procedures (SOP) are not regularly updated and do not reference the appropriate EPA method.
10. Bench sheets are not properly maintained, as detailed below.
 - a. Bench sheets do not reference the appropriate EPA method
 - b. Correct units for all data entries are not properly labeled
 - c. Corrections were not made properly, whether by use of white-out or not initialing and dating cross-outs or scribbles
 - d. Several fields across different bench sheets are left blank leaving data only partially recorded
 - e. Transcription errors were noted between bench sheets and the information documented on the computer
 - f. The data recorded for multiple-day tastings was not recorded consistently, some were recorded under data of sample, some under date of results

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 2:50 pm November 30, 2017. At that time, the inspector provided details of the inspection and reviewed issues 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 is not recorded.
2. Inadequate handling of reagents and standards.
3. Inadequate maintenance and/or operation of equipment and instruments.
4. Improper EPA methods used.
5. Use of non-certified NIST weights and thermometer in testing procedure.
6. Maintenance of SOPs and bench sheets

Section IV – FOLLOW UP

No Information was received by EPA after exiting the Facility on November 30, 2017. A copy of this report will be sent to the facility.

