



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, D.C. 20460

NPDES Compliance Inspection Report

Form Approved
OMB No. 2040-0003
Approval Expires 7-31-85

Section A: National Data System Coding

Transaction Code	NPDES	yr/mo/day	Inspec. Type	Inspector	Fac Type
1 <input type="text" value="N"/> 2 <input type="text" value="5"/> 3 <input type="text" value="A"/> <input type="text" value="R"/> <input type="text" value="0"/> <input type="text" value="0"/> <input type="text" value="2"/> <input type="text" value="0"/> <input type="text" value="2"/> <input type="text" value="7"/> <input type="text" value="3"/> 11 12 <input type="text" value="0"/> <input type="text" value="7"/> <input type="text" value="0"/> <input type="text" value="8"/> <input type="text" value="1"/> <input type="text" value="4"/> 17 18 <input type="text" value="R"/> 19 <input type="text" value="S"/> 20 <input type="text" value="1"/>	Remarks				
<input type="text" value="A"/> <input type="text" value="F"/> <input type="text" value="I"/> <input type="text" value="N"/> <input type="text" value="0"/> <input type="text" value="4"/> <input type="text" value="-"/> <input type="text" value="0"/> <input type="text" value="0"/> <input type="text" value="1"/> <input type="text" value="0"/> <input type="text" value="6"/>					
Inspection Work Days	Facility Evaluation Rating	BI	QA	-----Reserved-----	
67 <input type="text"/> <input type="text"/> <input type="text"/> 69	70 <input type="text" value="N"/>	71 <input type="text" value="N"/>	72 <input type="text" value="N"/>	73 <input type="text"/>	74 75 <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> 80

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) City of Siloam Springs Wastewater Treatment Plant 975 Anderson Ave Siloam Springs, AR 72761	Entry Time /Date	Permit Effective Date
	1055 / 08-14-07	4-01-02
	Exit Time/Date	Permit Expiration Date
	1215 / 08-14-07	3-31-07
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Tom Myers/Wastewater Superintendent/479-524-5623/479-524-4653	Other Facility Data	
Name, Address of Responsible Official/Title/Phone and Fax Number Trevor Bowman/Public Works Director/479-524-5136/479-524-8513 City of Siloam Springs P.O. Box 80 Siloam Springs, AR 72761	Outfall 001: N 36.19396 W -94.56398	
<p style="text-align: center;">Contacted</p> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>		

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

<input type="text" value="N"/> Permit	<input type="text" value="N"/> Flow Measurement	<input type="text" value="N"/> Operations & Maintenance	<input type="text" value="N"/> Sampling
<input type="text" value="N"/> Records/Reports	<input type="text" value="N"/> Self-Monitoring Program	<input type="text" value="N"/> Sludge Handling/Disposal	<input type="text" value="N"/> Pollution Prevention
<input type="text" value="N"/> Facility Site Review	<input type="text" value="N"/> Compliance Schedules	<input type="text" value="N"/> Pretreatment	<input type="text" value="N"/> Multimedia
<input type="text" value="N"/> Effluent/Receiving Waters	<input type="text" value="N"/> Laboratory	<input type="text" value="N"/> Storm Water	<input type="text" value="S"/> Other: Upset mitigation

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

This reconnaissance inspection was conducted following a reported toxic slug that caused an upset at the WWTP on the morning of 8/8/07. On that morning, Mr. Myers noticed that the activated sludge process was black in color rather than its normal brown color. He observed an oily film on top of the process and that the wastewater color was black. He determined that a slug load of an oily substance, likely waste oil, had entered the collection system and arrived at the plant during the previous night. He then bypassed a portion of the influent flow to the equalization and began high volume wasting from the final and primary clarifiers. The receiving stream at the Outfall was cloudy with discolored algae, but there was no apparent impact to aquatic life. Shocked solids were pumped from the clarifiers on the 8th and 9th and placed in drying beds. This material will be disposed of at Cherokee Landfill. Because the high volume wasting that was implemented to remove the toxic substance from the liquid stream had killed the bacteria in the sludge digester, aerobic activated sludge was obtained from the City of Rogers. Samples were taken on the 8th and 9th at the Outfall and from the mixed liquor at the final clarifier. The lab results from the 8th are included in a report to the ADEQ dated 8/14/07. At the time of this inspection, the effluent at the receiving stream was clear and apparently healthy fish were observed in Sager Creek. The waste oil slug is suspected to have been introduced into the collection by a local plastic chairs manufacturer; however, this has not yet been confirmed by the City.

Name(s) and Signature(s) of Inspector(s) John Fazio	Agency/Office/Telephone/Fax Arkansas Dept. of Environmental Quality/ Fayetteville/479-267-0811 ext 16/479-267-0819	Date August 20, 2007
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date

ADEQ

ARKANSAS
Department of Environmental Quality

August 27, 2007

Trevor Bowman, Public Works Director
City of Siloam Springs
P.O. Box 80
Siloam Springs, Arkansas 72761

RE: AFIN: 04-00106

NPDES Permit No.: AR0020273

Dear Mr. Bowman:

On August 14, 2007, Alison West, Field Inspector, and I performed a reconnaissance compliance evaluation inspection of the Siloam Springs waste water treatment facility in accordance with the provisions of the federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, and the regulations promulgated there under. The inspection was conducted following the toxic slug upset that occurred at the plant on August 8, 2007.

The inspection revealed that you and your staff reacted appropriately and effectively in response to the process upset. The Department appreciates the professional manner in which you and your staff handled the situation.

If you have any questions, please call me at 479-267-0811, ext. 16.

Sincerely,



John Fazio
District 1 Field Inspector
Water Division

cc: Water Division Enforcement Branch
Water Division Permits Branch



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1 N 2 5 3 A R 0 0 2 0 2 7 3 11 12 0 7 0 8 1 4 17 18 V 19 S 20 1					
Remarks					
A F I N 0 4 - 0 0 1 0 6 M A J O R M U N I C I P A L					
Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
67 69	70 3	71 N	72 N	73	74 75 80

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) City of Siloam Springs 975 Anderson Avenue Siloam Springs, AR	Entry Time /Date 1:05 PM 8-14-07	Permit Effective Date 4-01-02
	Exit Time/Date 1:25 PM 8-14-07	Permit Expiration Date 3-31-07
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Trevor Bowman/Public Works Director/479-524-5136/479-524-8513 Tom Myers/Wastewater Superintendent/479-524-5623/479-524-8513	Other Facility Data	
Name, Address of Responsible Official/Title/Phone and Fax Number Trevor Bowman/Public Works Director/479-524-5136/479-524-8513 City of Siloam Springs P.O. Box 80 Siloam Springs, AR 72761	Contacted Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

S	Permit	N	Flow Measurement	N	Operations & Maintenance	N	Sampling
N	Records/Reports	N	Self-Monitoring Program	N	Sludge Handling/Disposal	N	Pollution Prevention
N	Facility Site Review	N	Compliance Schedules	N	Pretreatment	N	Multimedia
N	Effluent/Receiving Waters	N	Laboratory	N	Storm Water	U	Other: SSO

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

An sso inspection was conducted due to a complaint received on August 7, 2007. The complainant alleged that a manhole overflowed on Washington Road in Siloam Springs and alleged that the waste had entered the waters of the State. On August 14, 2007, John Fazio, District Field Inspector, and I conducted a site evaluation to see if we could see any evidence of a sanitary sewer overflow on Washington. At the time of investigation, we did observe where two separate sanitary sewer overflows had occurred. There was lime and hay spread in the area. Mr. Fazio and I met with Mr. Myers and Mr. Bowman on-site. We were informed that an overflow had occurred at this location sometime around July 18-20, 2007. Mr. Bowman had not reported the overflows within 24 hours of becoming aware of the incident.

Name(s) and Signature(s) of Inspector(s) Alison West <i>Alison West</i>	Agency/Office/Telephone/Fax ADEQ/Fayetteville/479-267-0811 ext 12/479-267-0819	Date August 21, 2007
John Fazio	ADEQ/Springdale/501-682-0744/NA	
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date

ADEQ

ARKANSAS
Department of Environmental Quality

August 27, 2007

Trevor Bowman, Public Works Director
City of Siloam Springs
P.O. Box 80
Siloam Springs, AR 72761

RE: AFIN: 04-00106

NPDES Permit No.: AR0020273

Dear Mr. Bowman:

On August 14, 2007, John Fazio, District Field Inspector, and I performed a complaint/sanitary sewer overflow inspection of the waste water treatment facility in accordance with the provisions of the federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, and the regulations promulgated there under. This inspection revealed the following violation:

All overflows in the collection system are not being reported to the Department as required. Specifically, overflows at a manhole on Sycamore St as well as Crossbow. All overflows and discharges must be reported to the Department either verbally, by e-mail, or by fax within 24 hrs of becoming aware of the incident.

The above item requires your immediate attention. Please submit a written response to this finding to the NPDES Enforcement Section of this Department when the violation has been corrected. This response should contain documentation describing the course of action taken to correct the items noted. The written response is due by September 14, 2007.

If I can be any assistance, please contact me at 479-267-0711 ext 12.

Sincerely,



Alison West
Field Inspector
Water Division

cc: Permit Branch
Enforcement Branch

**ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY
P. O. BOX 8913, LITTLE ROCK, AR 72219-8913**

COMPLAINT REPORT

LOG#:	AFIN#: 04-00106	PERMIT#: AR0020273
DATE RECEIVED: 8-7-07	COUNTY: Benton	
COMPLAINANT NAME: Kristy Dee	COMPLAINT AGAINST: Trevor Bowman, Public Works Dir. Siloam Springs POTW	
ADDRESS: NA	ADDRESS: P.O. Box 80 Siloam Springs, AR 72761	
PHONE: 479-524-8512 FAX: NA	PHONE: 479-524-5136	FAX: 479-524-8513

PERSON RECEIVING REPORT: Alison West	DATE: 8-7-07	SUPERVISOR REFERRAL:	DATE:
INSPECTOR REFERRED:	DATE:	MEDIA SUPERVISOR REFERRAL:	DATE:
PHONE REFERRAL CONTACT:	DATE:	RECEIVING INSPECTOR: Alison West	DATE: 8-7-07

DESCRIPTION (IN DETAIL)

Sanitary sewer overflows at two separate manholes on Washington Street in Siloam Springs. The grass is dead and it appears as though lime has been spread.

LOCATION (IN DETAIL)

On Washington St. near Simmons Pet Food plant.

PREVIOUS COMPLAINT? YES NO **DATES:**

DISCHARGE TO STREAM? YES NO **NAME OF STREAM:**

HOW COMPLAINT WAS RECEIVED: PHONE LETTER VERBAL FAX E-MAIL

FOLLOW UP ON COMPLAINT

COMPLAINT #:

AFIN #: 04-00106

INSPECTOR: Alison West and John Fazio

DATE: 8-14-07

ACTION TAKEN:

PHOTOS TAKEN: Yes

On August 14, 2007, John Fazio, District Field Inspector, and I investigated the complaint. We observed where two separate manholes had overflowed on Washington Street. There was hay and lime spread in the area of the manholes. After observing the manholes, we drove to the Siloam Springs POTW and met with Tom Myers, Wastewater Superintendent. He contacted city personnel about the sanitary sewer overflows as he did not show them on the tabular format for Washington Street. We met Trevor Bowman, Public Works Director, and Mr. Myers at the site around 1 p.m. as they were not aware of the sso's. According to city personnel, the sanitary sewer overflows occurred sometime around July 18-20, 2007. These overflows were not reported to the Department as required by the City of Siloam Springs permit.

FURTHER ACTION TAKEN/TO BE TAKEN:

This has been referred to the Permit and Enforcement Section of the Department.

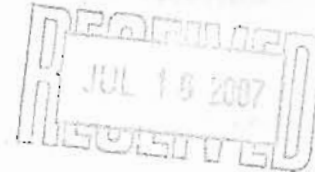
INSPECTOR SIGNATURE: *Alison West*

DATE: 8-22-07

HOURS WORKED:



035402
7630 -DB



- SL to Frank

August 14, 2007

Mr. Dennis Benson
Arkansas Department of Environmental Quality
5301 North Shore Drive
North Little Rock, AR 72118-5317

RE: Written Notice of Wastewater Plant Process Upset - Slug Load
Siloam Springs, Arkansas NPDES Permit No. AR0020273

Dear Mr. Benson:

In accordance with Standard Conditions in the City of Siloam Springs NPDES permit referenced above, this letter is to provide written notice of upset. On August 8, 2007 at 7:30 a.m., upon arriving at the plant, Mr. Tom Myers, Wastewater Plant Superintendent, noticed that the activated sludge process was black in color instead of its normal brown color. Mr. Myers proceeded to investigate to determine if there was a problem. An oily film was on the top of the process and the wastewater color was black. Mr. Myers inspected the plant processes and determined that a slug load of an oily substance had entered the collection system and arrived at the plant during the previous night.

Mr. Myers organized the employees, started to by-pass a portion of the influent flow to the equalization basin, and began high volume wasting from final and primary clarifiers. Mr. Myers then went to City Hall to meet with me to discuss the slug load, and present to me his proposed plan of action to correct the problem. Mr. Myers and I agreed on the plan and together went to the wastewater plant to observe the processes and the receiving stream, Sager Creek.

We observed Sager Creek at the point of the plant's discharge and at a location southwest of the wastewater plant, near the Arkansas/Oklahoma State line. At both locations the stream was cloudy, with discolored algae, but showed no evidence of damage to aquatic life. From there we went approximately one half mile downstream to a bridge in Delaware County, Oklahoma to observe the stream. The stream was clear and fish were present.

From there we went back to the wastewater plant where Mr. Myers called Mr. John Fazio, District 1 Inspector for ADEQ, and Mr. Dennis Benson, NPDES Compliance Officer ADEQ, to inform them of the slug load to the plant. The estimated time the slug load entered the plant was between 5:30 p.m., Tuesday, August 7th, and 7:00 a.m., Wednesday, August 8th. Mr. Fazio was contacted at 10:05 a.m. on Wednesday, at (479) 267-0811 ext. 16. Mr. Benson was contacted at 10:08 a.m., on Wednesday, at (501) 682-0640. Because neither gentleman was present to answer the phone, Mr. Myers left a phone message regarding the slug load.

By this time, the high volume wasting implemented to remove the oily substance from the liquid stream had killed the bacteria in the sludge digester. A call was made at 10:15 a.m., Wednesday, to the City of Rogers Wastewater Facility to request aerobic activated sludge from their plant. Mr. Mike Lawrence agreed to the request and said that we could have as much as we needed.

A call was made at 10:25 a.m., Wednesday, to Terra Renewal Services (TRS), to haul the sludge from the Rogers plant to our plant. Mr. Tommy Hunt, field Manager for TRS, said they could not get a truck to Rogers on Wednesday, but could first thing Thursday, August 9th. Mr. Myers then called to confirm the arrangement with the Rogers Wastewater Plant.

At 11:34 a.m. on Wednesday the regular effluent composite sample was transferred to Environmental Testing Group (ETG) as required by the City's NPDES Permit. In addition, a sample of mixed liquor from the final clarifier was collected and transferred to ETG. Both samples were received by Joshua Marshall and taken to the lab, where they were received at 12:44 p.m. For the effluent sample we requested that testing be performed for chemical oxygen demand (COD) in addition to the required testing for ammonia, carbonaceous BOD and total suspended solids. The COD analysis was requested in order to obtain results as quickly as possible. For the mixed liquor we requested testing for ammonia, COD and oil/grease.

Due to our proximity to the Arkansas/Oklahoma state line, the Oklahoma Department of Environmental Quality was contacted at (800) 256-2365 (ODEQ's by-pass hotline) at 3:30 p.m., Wednesday, August 8th. The call was received by an answering machine for a Mr. Tucker. Mr. Myers left a message regarding slug load.

At approximately 2:30 p.m. on Wednesday I telephoned Ms. Shirley Hoskins at ADEQ after reviewing ADEQ's website to obtain additional numbers to use in performing the 24 hour reporting required under the City's NPDES permit. Ms. Hoskins took all the information and inputted it to a form. Ms Hoskins then called back to say that the form she used was not the proper form and that the information in the form used during the 2:30 call had been lost. I provided the information regarding the upset and it appears that the information was entered into a bypass report. The number 14297 was provided at the conclusion of the telephone report. Please note that this incident is not a bypass incident, it is an upset event. The City's wastewater treatment facilities were not bypassed. From Wednesday through Saturday afternoon as much wastewater as possible was diverted from the headworks to the equalization basin for holding until treatment could be reestablished at which time the wastewater was treated through the entire system.

At approximately 4:10 p.m. on Wednesday Mr. Myers received the results of the lab testing by phone. The are listed in the following table.

	<u>Effluent</u>	<u>Mixed Liquor</u>
Ammonia as N (mg/l)	5.35	34.6
Carbonaceous BOD (mg/l)	3.17	N/A
Chemical Oxygen Demand (mg/l)	14.0	5710
Total Suspended Solids (mg/l)	5.50	N/A
Oil/Grease (mg/l)	N/A	39.1

After 5:00 p.m. on Wednesday, a call was received at the Wastewater Facility answering machine from Mr. Benson with ADEQ. Mr. Benson apologized for calling back late, stating that he had been in meetings all day.

He requested that Mr. Myers call him Thursday Morning. Mr. Myers placed a call to Mr. Benson's office at 10:00 a.m., Thursday, but Mr. Benson had stepped out of the office. Mr. Benson's secretary said he would call Mr. Myers back.

At approximately 5:15 p.m. Wednesday, I observed the stream at the bridge in Oklahoma, and found it to be in similar to what it was that morning.

All day Wednesday and through the night to Thursday morning solids were pumped from clarifiers. At 7:50 a.m., Thursday, confirmation was made that TRS was present at the Rogers Wastewater Plant to collect the sludge. At 8:05 a.m., I arrived at the wastewater facility to review activities with Mr. Myers, and to observe the discharge from the plant. Mr. Myers and I also observed Sager Creek near the state line and at the bridge in Delaware County. The conditions at the two downstream sites were similar to the previous day. By this time the stream did exhibit very limited cloudiness at the Oklahoma bridge. Aquatic life at all locations appeared healthy.

By 9:40 a.m. the sludge was loaded and being transported to Siloam Springs for delivery. Loads of sludge were received at the Siloam Springs plant at 10:45 a.m. and 2:45 p.m. on Thursday, and 11:35 a.m. and 3:05 p.m. on Friday.

At approximately 5:15 p.m. Thursday, I observed the stream at the bridge in Oklahoma, and found it to be in similar to what it was that morning.

At approximately 8:15 a.m. on Friday, Mr. Myers and I observed the stream at plant's discharge, near the state line and at the bridge in Oklahoma, and found noticeable improvement. By Saturday morning, all three locations looked quite healthy.

To date we have not received any additional test results from ETG. If you need any other additional information, please contact my office at (479) 238-0927.

Sincerely,



Trevor Bowman P.E.
Water/Wastewater Director

cc: Peggy Woody, City Clerk
David Cameron, City Administrator
Tom Myers, Wastewater Superintendent
Greg Hurley, ADEQ, 5301 North Shore Drive, Little Rock, AR 72118-5317
Mr. John Fazio, ADEQ, 4170 West 6th St. Suite # 5 Fayetteville, AR 72704
Parthy Evans, Attorney, Stinson, Morrison Hecker