

March 17, 2016

Thomas Myers, Wastewater Superintendent City of Siloam Springs 400 N. Broadway Siloam Springs, AR 72761

RE: City of Siloam Springs Pollution Control Facility Inspection AFIN: 04-00106 Permit No.: AR0020273

Dear Mr. Myers:

On February 24, 2016, David Long, U.S. EPA Region 6 Environmental Scientist, ADEQ Water Division District 1 Inspector Matt Holden, and I performed a Compliance Evaluation Inspection of the above referenced facility in accordance with the provisions of the Federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, and the regulations promulgated thereunder. A copy of the inspection report is enclosed for your records.

Please refer to the "Summary of Findings" section of the attached inspection report and provide a written response for each violation that was noted. This response should be mailed to the attention of the Water Division Inspection Branch at the address at the bottom of this letter or e-mailed to <u>Water-Inspection-Report@adeq.state.ar.us</u>. This response should contain documentation describing the course of action taken to correct each item noted. This corrective action should be completed as soon as possible, and the written response with all necessary documentation (i.e. photos) is due by March 31, 2016.

If I can be of any assistance, please contact me at west@adeq.state.ar.us or 479-267-0811, ext. 12.

Sincerely, Joy alison West

Alison West District 1 Field Inspector Water Division

WATER DIVISION INSPECTION REPORT								
			ERMIT #: AR0020	DATE: 2/24/2016				
			UNTY: 04 Bento	n	#: 089719	MEDIA: WN		
A R K A N S A S Department of Environmental Quality GPS LAT: 36.1134				LONG: 94.3348 L	OCAT	ION: Genera	Il Area	
NAME	FACILITY INFORMAT	ION			-	FION INFORI	MATION	
	y of Siloam Springs Pollution Co	ntro	I Facility	FACILITY TYPE: 1 - Municipal		9 T-Joint Sta	ate/EPA-State Lead	
	Anderson Ave.			FACILITY EVALUATION RATING: INSPECTION TYPE: 3 - Satisfactory Compliance Sampling				
	oam Springs, AR 72761			DATE(S): ENT 02/24/2016 09	PERMIT EFFECTIVE DATE: 10/1/2007			
NIANAE	RESPONSIBLE OFFIC	CIAL	-		-		PERMIT EXPIRATION DATE:	
Th	omas Myers / Wastewater Super	inte	ndent				9/30/2012	
	ANY: y of Siloam Springs			FAYETTEVILLE SHALE RELATED: N				
MAILI	IG ADDRESS:			FAYETTEVILLE				
	N. Broadway			NAME/TITLE/PHONE/FAX/EMAIL		ION PARTIC	JPANIS	
Sil	oam Springs AR 72761			Thomas Myers,				
	e&ext: / fax:)-524-5623 / 479-524-4653			David Long, U.S 665-7323	6. EPA	Environmen	ntal Scientist/(214)	
EMAIL	:				trict 1	Field Inspec	ctor/479-267-0811	
tm	<pre>/ers@siloamsprings.com NTACTED DURING INSPECTION:</pre>	Va		ext. 16/holden@				
00		. Tes						
	(S=S:	atisfac		LUATIONS isfactory, N=Not Applicable/E	Evaluated)		
S	PERMIT	S	FLOW MEASUR		Ν	STORMWA		
S	RECORDS/REPORTS	S	LABORATORY		Μ			
M	OPERATION & MAINTENANCE	U			S			
S **								
	SUMMARY OF FINDINGS							
	1. Carbonaceous Biochemical	Оху			olids,	and Total Ph	nosphorous	
	exceeded permit limits for 7 day average in October, 2015. This is in violation of Part I, Section A of							
	your permit. These excursions have been reported to the Department and no further action is required.							
	2. Persistent foam was observed in the receiving stream. This is in violation of Part I, Section A of the							
	permit.							
GENERAL COMMENTS								
	On February 24, 2016, David Long, U.S. EPA Region 6 Environmental Scientist, Water Division District 1							
Inspector Matt Holden, and I performed a Compliance Evaluation Inspection at the above referenced facility.								
Thomas Myers, Wastewater Superintendent, gave us a tour of the facility. Records were reviewed at the facility and office.								
Although a No Exposure Certification Inspection was not conducted at the time of the inspection, the								
Department discussed the need to clean solids from the grate at the headworks. On February 25, 2016, Mr.								
Myers emailed photographs showing the solids had been removed.								
In addition, the facility needs to maintain better records of equipment maintenance and repair.								
Anna Alina Went								
INS	SPECTOR'S SIGNATURE:	, m	oon West	ison West			DATE: 3-16-2016	
	1 0 000 -							
SU	PERVISOR'S SIGNATURE:	in R	Jas	on Bolenbaugh			DATE: 3/17/2016	
			240					

SECTION A: PERMIT VERIFICATION	
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS	
DETAILS:	
1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE:	
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES:	
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT:	
4. ALL DISCHARGES ARE PERMITTED:	
SECTION B: RECORDKEEPING AND REPORTING EVALUATION	
RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT	
DETAILS: The facility needs to maintain better records of equipment maintenance and	l repair.
1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS:	
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE:	🗹 s 🗆 m 🗇 u 🗆 na 🗇 n
a. DATES AND TIME(S) OF SAMPLING:	
b. EXACT LOCATION(S) OF SAMPLING:	
c. NAME OF INDIVIDUAL PERFORMING SAMPLING:	
d. ANALYTICAL METHODS AND TECHNIQUES:	
e. RESULTS OF CALIBRATIONS:	
f. RESULTS OF ANALYSES:	
g. DATES AND TIMES OF ANALYSES:	
h. NAME OF PERSON(S) PERFORMING ANALYSES:	
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE:	
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR:	
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA:	
SECTION C: OPERATIONS AND MAINTENANCE	
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED	
DETAILS: Foam was observed in the reaeration basin and receiving stream.	
1. TREATMENT UNITS PROPERLY OPERATED:	OS 🗹 M 🗇 U 🗆 NA 🗇 N
2. TREATMENT UNITS PROPERLY MAINTAINED:	Øs 🗆 m 🗇 u 🗆 na 🗇 n
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED:	
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE:	
5. ALL NEEDED TREATMENT UNITS IN SERVICE:	
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED:	
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED:	
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE:	
9. STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED:	
10. PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED:	
11. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR:	
12. IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED:	
 IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED: HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS: HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT: 	<u> </u>

SECTION D: SAMPLING	·				
PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS					
DETAILS:					
1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT:					
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES:					
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT:					
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT:	🗹 y 🗆 n 🗆 na 🗇 ne				
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT:	Øy 🛛 n 🖓 na 🖓 ne				
6. SAMPLE COLLECTION PROCEDURES ADEQUATE:	Øy 🛛 n 🖓 na 🖓 ne				
a. SAMPLES REFRIGERATED DURING COMPOSITING:	🗹 Y 🗆 N 🗆 NA 🗆 NE				
b. PROPER PRESERVATION TECHNIQUES USED:					
c. CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136:					
7. IF MONITORING IS PERFORMED MORE OFTEN THAN REQUIRED ARE RESULTS REPORTED ON THE DMR:					
SECTION E: FLOW MEASUREMENT					
PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS					
PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: TYPE OF DEVICE: <u>5ft Rectangu</u> <u>without end contractions</u>					
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED:	🗹 y 🗆 n 🗆 na 🗇 ne				
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED:	Øy 🛛 n 🖓 na 🖓 ne				
4. CALIBRATION FREQUENCY ADEQUATE:	Øy 🛛 n 🖓 na 🖓 ne				
5. RECORDS MAINTAINED OF CALIBRATION PROCEDURES:					
6. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE:					
7. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE:					
8. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES:					
9. HEAD MEASURED AT PROPER LOCATION:					
SECTION F: LABORATORY					
PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS	ØS OM OU ONA ONE				
DETAILS:					
EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(B) FOR SLUDGES) :					
IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED:					
SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT:					
DUPLICATE SAMPLES ARE ANALYZED ≥10% OF THE TIME:					
SPIKED SAMPLES ARE ANALYZED >10% OF THE TIME:					
COMMERCIAL LABORATORY USED:					
	n Interplex				
	nis Rd., Little Rock, AR 72204				
PARAMETERS PERFORMED: NH3-N, CBOD5, NO3-N, TP, TSS, Total Recoverable Copper Chronic Biomonitoring					
BIOMONITORING PROCEDURES ADEQUATE:					
PROPER ORGANISMS USED:					
PROPER DILUTION SERIES FOLLOWED:	Øy 🗆 n 🗆 na 🗆 ne Øy 🗆 n 🗆 na 🗆 ne				
RETESTS AND/OR TRE PERFORMED AS REQUIRED:	Dy Dn Dna Øne				

SECTION G	: EFFLUENT/R	ECEIVING WA	FERS OBSERV	ATIONS						
BASED ON	BASED ON VISUAL OBSERVATIONS ONLY									
DETAILS: Foam was observed in the reaeration basin and receiving stream.										
OUTFALL #:	TFALL #: OIL SHEEN GREASE TURBIDITY VISIBLE FOAM FLOATING SOLIDS COLOR OTHER									
001	None	None	None	Persistent	None	Clear				
			·			·				
SECTION H	: SLUDGE DIS	POSAL								
SLUDGE D	DISPOSAL MEE	ETS PERMIT F	REQUIREMEN	TS		ØS 🗆 M 🗆	U DNA DNE			
DETAILS:	Sludge is dispo	osed at Waste	lanagement La	ndfill in Tontito	wn, AR.					
SLUDGE MANAG	GEMENT ADEQUATE 1	TO MAINTAIN EFFLUE	INT QUALITY:			⊠s ⊡m				
SLUDGE RECOR	RDS MAINTAINED AS F	REQUIRED BY 40 CFF	R 503:			□s □m				
FOR LAND APPL	LIED SLUDGE, TYPE C	OF LAND APPLIED TO	: (E.G., FOREST, AGR	RICULTURAL, PUBLIC	CONTACT SITE): <u>NA</u>					
SECTION I:	SAMPLING IN	SPECTION PRO	DCEDURES							
SAMPLE R	RESULTS WITH	HIN PERMIT R	EQUIREMENT	ſS			U ⊠NA ⊡NE			
DETAILS:										
SAMPLES OBTA	INED THIS INSPECTION	ON:				ΠY	□n Øna □ne			
TYPE OF SAMPL		OMPOSITE: METH	OD: FREQUENCY	:						
SAMPLES PRES	ERVED:					ΠY	⊡n Øna ⊡ne			
FLOW PROPOR	TIONED SAMPLES OB	STAINED:				ΠY	□n Øna □ne			
SAMPLE OBTAIN	NED FROM FACILITY'S	SAMPLING DEVICE:				ΠY	🗆 n 🗹 na 🗆 ne			
SAMPLE REPRESENTATIVE OF VOLUME AND NATURE OF DISCHARGE:						🗆 n 🗹 na 🗆 ne				
SAMPLE SPLIT	SAMPLE SPLIT WITH PERMITTEE:						🗆 n 🗹 na 🗆 ne			
CHAIN-OF-CUSTODY PROCEDURES EMPLOYED:						⊡n Øna ⊡ne				
SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT:										
SECTION J: STORM WATER POLLUTION PREVENTION PLAN										
STORM W	ATER MANAG	EMENT MEET	S PERMIT RE	QUIREMENTS	\$		U ⊡NA ØNE			
DETAILS:	The facility has	a No Exposur	e Certification.	Permit tracking	<u>number is #ARF</u>	<u>R000276.</u>				
SWPPP UPDATED AS NEEDED: DATE OF LAST UPDATE:						□n □na Øne				
SITE MAP INCLUDING ALL DISCHARGES AND SURFACE WATERS:						□n □na Øne				
POLLUTION PREVENTION TEAM IDENTIFIED:						□n □na Øne				
POLLUTION PREVENTION TEAM PROPERLY TRAINED:						🗆 n 🗆 na 🗹 ne				
LIST OF POTENTIAL POLLUTANT SOURCES:						□n □na Øne				
LIST OF POTENTIAL SOURCES AND PAST SPILLS AND LEAKS:						□n □na Øne				
ALL NON-STORM WATER DISCHARGES ARE AUTHORIZED:										
LIST OF STRUCTURAL BMPS:						Dy Dn Dna Øne				
LIST OF NON-ST	RUCTURAL BMPS:					Ωy	□n □na Øne			
BMPS PROPERI	Y OPERATED AND M	AINTAINED:				ΠY	□n □na Øne			
INSPECTIONS CONDUCTED AS REQUIRED:										

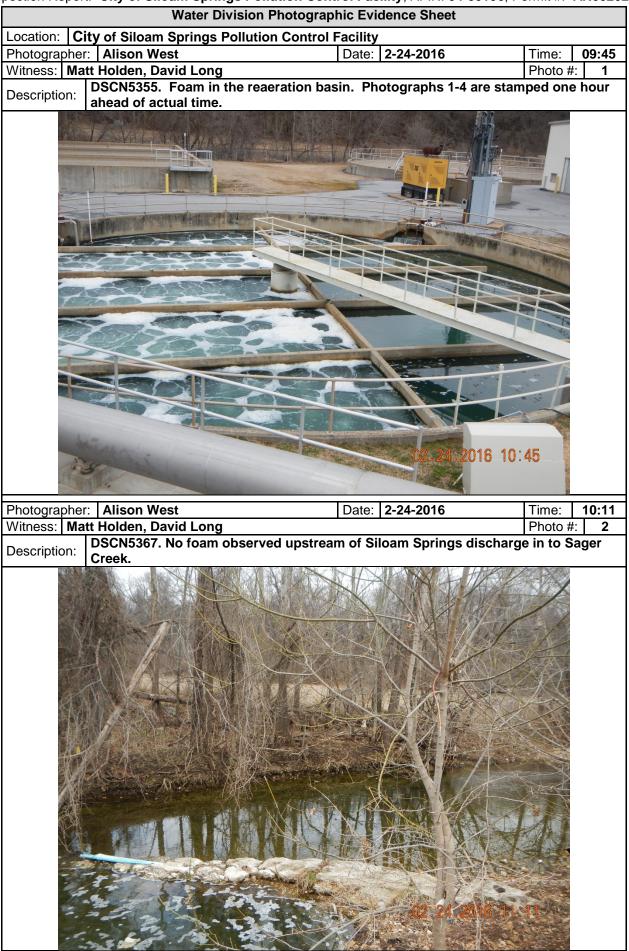
	FLOW	CALCUL	ATION	SHEET
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Date: 02/	24/2016	Time: 11:52			
		· · · · · · · · · · · · · · · · · · ·			
Head in Inc	hes:	Feet: 0.56			
Tupo & Size	o of Drimony Flow	Maggurament Dovigo: 6	E foot rootongular wair without and		
contraction:		ivieasurement Device.	5 foot rectangular weir without end		
Nome 8 Ma	del of Secondary	Clow Magguramont Da	vice: ISCO Signature Flow Motor		
	Duel of Secondary	Flow measurement De	vice: ISCO Signature Flow Meter		
Date of last	Calibration of Se	condary Flow Device:	01/28/2015		
			·		
Recorded F	low at Date & Tir	ne Listed Above: 3094	GPM (Facility Flow Meter)		
Colculated	Flow at Data 8 Ti	me Listed Above: 313	32 GPM		
(Flow is calculated using flow charts in: ISCO Open Channel Flow Measurement Handbook-5 th Edition)					
	Recorded Value	e - Calculated Value	X 100		
% Error =	Calc	ulated Value	- X 100		
% Error =	3094	- 3132	- X 100		
70 En 01 -		3132			
	20				
% Error =	-38	X 100			
	3132				
% Error =	-0.012	X 100			
0/ 5	4.0	0/			
% Error =	-1.2	%			
Comments:					
L					

DMR Calculation Check

Reporting Period:	From	From <u>2016</u> 01 Year Month		01 Day	_ To _	2016 Year	01 Month	<u>31</u> Day	
Parameter Checked:	(CBOD5							
		Loading Mass		Concentration Monthly					
	Mo. A	Avg Ibs/c	lay	Mo. A	vg r	ng/l	7-day A	vg mg/l	
Reported Value:		122.2		4.54			6	.21	
Calculated Value:	122.2		4.54			6	.21		
Permit Value:	550		15			2	2.5		

If calculated value does not equal reported value, explain:





From:	Tom Myers
То:	Water-Inspection-Report
Cc:	West, Alison; Steven Gorszczyk; Jack Harrison
Subject:	City of Siloam Springs Response to ADEQ Compliance Monitoring Findings on 2-24-2016
Date:	Wednesday, March 30, 2016 12:53:36 PM
Attachments:	Response to ADEQ Compliance Monitoring Findings on 2-24-2016.pdf

Water-Inspection-Report

Arkansas Department of Environmental Quality

5301 Northshore Drive

North Little Rock, AR 72118-5317

Here attached is a response to ADEQ Compliance Monitoring Findings on 2-24-2016 for City of Siloam Springs Wastewater Facility.

Respectfully submitted,

Thomas A. Myers Wastewater Superintendent City of Siloam Springs Ph:479-524-5623 Cell:479-228-0934 tmyers@siloamsprings.com



March 29, 2016

Via Email: Water-Inspection-Report@adeq.state.ar.us

Water Division Inspection Branch Arkansas Department of Environmental Quality 5301 North Shore Drive North Little Rock, AR 72118-5317

RE: Siloam Springs Wastewater Treatment Facility AFIN: 04-00106 Permit No.: AR0020273

Please allow this letter to serve as response to the Routine Compliance Evaluation Inspection Letter dated March 17, 201, and received by our office on March 21, 2016. The letter resulted from an ADEQ inspection conducted on February 24, 2016 by Mr. David Long, U.S. E.P.A. Region 6 Environmental Scientist, Ms. Alison West and Mr. Matt Holden, District 1 Field Inspectors.

COMPLIANCE EVALUATION INSPECTION

Two items were listed in the Summary of Findings section of the inspection report. The first item stated that there were excursions to the discharge permit but those excursions were reported to the Department and no further action was required.

The second finding was persistent foam observed in the receiving stream. This is in violation of Part I, Section A of the discharge permit.

Response:

With regard to the second finding, the dissolved oxygen in the chlorine contact chamber was set higher than needed. Staff immediately reduced the oxygen feed to the chlorine contact chamber to eliminate the foam and still meet the 7 ppm dissolved oxygen limit. The foam dissipated and has remained so since the initial finding.

The City of Siloam Springs takes our compliance with ADEQ seriously. We have taken the necessary steps to comply with the findings in the compliance inspection report.

Sincerely,

Thomas A. Myers, Wastewater Superintendent (479) 524-5623 tmyers@siloamsprings.com

Cc: Steve Gorszczyk, Public Works Director Renea Ellis, City Clerk Alison West, District 1 Field Inspector



April 1, 2016

Thomas Myers, Wastewater Superintendent City of Siloam Springs 400 N. Broadway Siloam Springs, AR 72761

RE: Adequate Response- City of Siloam Springs Pollution Control Facility Inspection AFIN: 04-00106 Permit No.: AR0020273

Dear Mr. Myers:

I have reviewed the response pertaining to my February 24, 2016 inspection of the above referenced facility. The information provided sufficiently addresses the violation referenced in my inspection report. At this time, the Department has no further comment concerning this particular inspection. Acceptance of this response by the Department does not preclude any future enforcement action deemed necessary at this site or any other site.

If we need further information concerning this matter, we will contact you. Thank you for your attention to this matter. Should you have any questions, feel free to contact me at 479.267.0811, ext. 12 or you may e-mail me at west@adeq.state.ar.us.

Sincerely. thison West

Alison West District 1 Inspector Water Division