ADEQ

A R K A N S A S
Department of Environmental Quality

May 24, 2018

Phillip Patterson, City Admin.
City of Siloam Springs
P.O. Box 80 400 Broadway
Siloam Springs, AR 72761

RE: Siloam Springs WWTP Inspection
AFIN: 04-00106 Permit No.: AR0020273

Dear Mr. Patterson:

On April 26, 2018, 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 Office of Water Quality Compliance Branch at the address at the bottom of this letter or e-mailed to Water-Inspection-Report@adeq.state.ar.us. 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 **June 14, 2018**.

If I can be of any assistance, please contact me at grimesg@adeq.state.ar.us or (479)267.0811 extension 16.

Sincerely,

Garrett Grimes
District 1 Field Inspector
Office of Water Quality

ADEQ
ARKANSAS
Department of Environmental Quality

# OFFICE OF WATER QUALITY INSPECTION REPORT

| | | |
|---|---|---|
| AFIN: **04-00106** | PERMIT #: **AR0020273** | DATE: **4/26/2018** |
| COUNTY: **04 Benton** | PDS #: **103014** | MEDIA: **WN** |
| GPS LAT: **36.19282** LONG: **-94.56320** LOCATION: **Entrance** | | |

## FACILITY INFORMATION

NAME:
**Siloam Springs WWTP**
LOCATION:
**975 Anderson**
CITY:
**Siloam Springs**

## RESPONSIBLE OFFICIAL

NAME: / TITLE
**Phillip Patterson / City Admin.**
COMPANY:
**City of Siloam Springs**
MAILING ADDRESS:
**P.O. Box 80 400 Broadway**
CITY, STATE, ZIP:
**Siloam Springs AR 72761**
PHONE & EXT: / FAX:
**479-524-5623 /**
EMAIL:
**tmyers@siloamsprings.com**

CONTACTED DURING INSPECTION: ***

## INSPECTION INFORMATION

| | |
|---|---|
| FACILITY TYPE: **1 - Municipal** | INSPECTOR ID#: **104111 S - State** |
| FACILITY EVALUATION RATING: **4 - Satisfactory** | INSPECTION TYPE: **Compliance Evaluation** |

DATE(S): **4/26/2018** ENTRY TIME: **09:30** EXIT TIME: **12:31**

PERMIT EFFECTIVE DATE: **10/1/2007**
PERMIT EXPIRATION DATE: **9/30/2017**

FAYETTEVILLE SHALE RELATED: **N**

FAYETTEVILLE SHALE VIOLATIONS: **N**

## INSPECTION PARTICIPANTS

NAME/TITLE/PHONE/FAX/EMAIL/ETC.:
**Tom Myers, Wastewater Superintendent, City of Siloam Springs;**
**Garrett Grimes, District 1 Inspector, ADEQ**

## AREA EVALUATIONS

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

| | | | | | |
|---|---|---|---|---|---|
| **S** | PERMIT | **S** | FLOW MEASUREMENT | ** | STORMWATER |
| **S** | RECORDS/REPORTS | **S** | LABORATORY | ** | FACILITY SITE REVIEW |
| **M** | OPERATION & MAINTENANCE | **S** | EFFLUENT/RECEIVING WATER | ** | SELF-MONITORING PROGRAM |
| **S** | SAMPLING | **S** | SLUDGE HANDLING/DISPOSAL | ** | PRETREATMENT |
| ** | OTHER: | | | | |

## SUMMARY OF FINDINGS

**The following violations were noted during the inspection:**

**1.) Operation and Maintenance; Part II, Section B.1.A. of the permit.**
- **a) Leaks were observed on the east primary clarifier (Photos #1 - #3, Attachment 1).**
- **b) Leaks were observed on the sludge thickener (Photos #4 - #6, Attachment 1).**
- **c) Established vegetation was observed growing in the sludge drying beds (Photo #7).**

**2) Flow Measurement; Part II, Section C.2. of the permit.**
- **a) The flow meter calibration check conducted during the inspection showed an error of 40% (Refer to Page 7). However, it appears the check may have been influenced by rapidly changing flow (Photos #8 - #9). The City of Siloam Springs should verify that the facility flow meter is functioning properly and submit appropriate records.**

## GENERAL COMMENTS

**-Several containers of a Sodium Chlorite were observed on the grounds near the dewatering belt press (Photo #10, Attachment 1). The containers appeared mostly empty, however, they were marked corrosive and the bottoms of several of the containers were corroded with an orange coloration on the surrounding soil (Photo #10). The City of Siloam Springs should verify that these containers are not leaking any remaining Sodium Chlorite and store them in a manner that does not risk spills to the surrounding environment.**

**-Excluding the above mentioned violations, the City of Siloam Springs Wastewater Treatment Plant appeared to be clean and well operated.**

| | |
|---|---|
| INSPECTOR'S SIGNATURE: **Garrett Grimes** | DATE: **05/22/2018** |
| SUPERVISOR'S SIGNATURE: **Jason Bolenbaugh** | DATE: **5/23/2018** |



ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY
5301 NORTHSHORE DRIVE / NORTH LITTLE ROCK / ARKANSAS 72118-5317 / TELEPHONE 501-682-0744 / FAX 501-682-0880
www.adeq.state.ar.us

## SECTION A: PERMIT VERIFICATION

| | |
|---|---|
| PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS | ☑S ☐M ☐U ☐NA ☐NE |
| DETAILS: | |
| 1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE: | ☑Y ☐N ☐NA ☐NE |
| 2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES: | ☐Y ☐N ☑NA ☐NE |
| 3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT: | ☑Y ☐N ☐NA ☐NE |
| 4. ALL DISCHARGES ARE PERMITTED: | ☑Y ☐N ☐NA ☐NE |

## SECTION B: RECORDKEEPING AND REPORTING EVALUATION

| | |
|---|---|
| RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT | ☑S ☐M ☐U ☐NA ☐NE |
| DETAILS: | |
| 1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS: | ☑Y ☐N ☐NA ☐NE |
| 2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE: | ☑S ☐M ☐U ☐NA ☐NE |
| a. DATES AND TIME(S) OF SAMPLING: | ☑Y ☐N ☐NA ☐NE |
| b. EXACT LOCATION(S) OF SAMPLING: | ☑Y ☐N ☐NA ☐NE |
| c. NAME OF INDIVIDUAL PERFORMING SAMPLING: | ☑Y ☐N ☐NA ☐NE |
| d. ANALYTICAL METHODS AND TECHNIQUES: | ☑Y ☐N ☐NA ☐NE |
| e. RESULTS OF CALIBRATIONS: | ☑Y ☐N ☐NA ☐NE |
| f. RESULTS OF ANALYSES: | ☑Y ☐N ☐NA ☐NE |
| g. DATES AND TIMES OF ANALYSES: | ☑Y ☐N ☐NA ☐NE |
| h. NAME OF PERSON(S) PERFORMING ANALYSES: | ☑Y ☐N ☐NA ☐NE |
| 3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE: | ☑S ☐M ☐U ☐NA ☐NE |
| 4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR: | ☑S ☐M ☐U ☐NA ☐NE |
| 5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA: | ☑Y ☐N ☐NA ☐NE |

## SECTION C: OPERATIONS AND MAINTENANCE

| | |
|---|---|
| TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED | ☐S ☑M ☐U ☐NA ☐NE |
| DETAILS: | |
| 1. TREATMENT UNITS PROPERLY OPERATED: | ☑S ☐M ☐U ☐NA ☐NE |
| 2. TREATMENT UNITS PROPERLY MAINTAINED: **Some leaks and vegetation in units.** | ☐S ☑M ☐U ☐NA ☐NE |
| 3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED: **Backup generator** | ☑S ☐M ☐U ☐NA ☐NE |
| 4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE: **7 PLCs & a new SCADA system scheduled for installation in May 2018** | ☑S ☐M ☐U ☐NA ☐NE |
| 5. ALL NEEDED TREATMENT UNITS IN SERVICE: | ☑S ☐M ☐U ☐NA ☐NE |
| 6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED: **Two Class IV, Two Class III, and one Class II** | ☑S ☐M ☐U ☐NA ☐NE |
| 7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED: | ☑S ☐M ☐U ☐NA ☐NE |
| 8. OPERATION AND MAINTENANCE MANUAL AVAILABLE: | ☑Y ☐N ☐NA ☐NE |
| 9. STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED: | ☑Y ☐N ☐NA ☐NE |
| 10. PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED: | ☑Y ☐N ☐NA ☐NE |
| 11. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR: | ☑Y ☐N ☐NA ☐NE |
| 12. IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED: | ☑Y ☐N ☐NA ☐NE |
| 13. HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS: **Hired RJN and Associate. $800k set aside for I&I improvements.** | ☑Y ☐N ☐NA ☐NE |
| 14. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT: **March 2018** | ☑Y ☐N ☐NA ☐NE |
| 15. IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT: | ☐Y ☑N ☐NA ☐NE |

| **SECTION D: SAMPLING** | |
|---|---|
| PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS | ☑S ☐M ☐U ☐NA ☐NE |
| DETAILS: | |
| 1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT: **Taken at Chlorination Basin** | ☑Y ☐N ☐NA ☐NE |
| 2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES: | ☑Y ☐N ☐NA ☐NE |
| 3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT: | ☑Y ☐N ☐NA ☐NE |
| 4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT: | ☑Y ☐N ☐NA ☐NE |
| 5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT: | ☑Y ☐N ☐NA ☐NE |
| 6. SAMPLE COLLECTION PROCEDURES ADEQUATE: | ☑Y ☐N ☐NA ☐NE |
| a. SAMPLES REFRIGERATED DURING COMPOSITING: | ☑Y ☐N ☐NA ☐NE |
| b. PROPER PRESERVATION TECHNIQUES USED: | ☑Y ☐N ☐NA ☐NE |
| c. CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136: | ☑Y ☐N ☐NA ☐NE |
| 7. IF MONITORING IS PERFORMED MORE OFTEN THAN REQUIRED ARE RESULTS REPORTED ON THE DMR: | ☐Y ☐N ☑NA ☐NE |

| **SECTION E: FLOW MEASUREMENT** | |
|---|---|
| PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS | ☑S ☐M ☐U ☐NA ☐NE |
| DETAILS: | |
| 1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: **5'** TYPE OF DEVICE: **Rectangular Weir w/out end contractions** | ☐Y ☐N ☐NA ☐NE |
| 2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED: | ☑Y ☐N ☐NA ☐NE |
| 3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED: | ☑Y ☐N ☐NA ☐NE |
| 4. CALIBRATION FREQUENCY ADEQUATE: | ☐Y ☑N ☐NA ☐NE |
| 5. RECORDS MAINTAINED OF CALIBRATION PROCEDURES: | ☑Y ☐N ☐NA ☐NE |
| 6. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE: | ☑Y ☐N ☐NA ☐NE |
| 7. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE: | ☑Y ☐N ☐NA ☐NE |
| 8. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES: | ☑Y ☐N ☐NA ☐NE |
| 9. HEAD MEASURED AT PROPER LOCATION: | ☑Y ☐N ☐NA ☐NE |

| **SECTION F: LABORATORY** | |
|---|---|
| PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS | ☑S ☐M ☐U ☐NA ☐NE |
| DETAILS: | |
| 1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(B) FOR SLUDGES) : | ☑Y ☐N ☐NA ☐NE |
| 2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED: | ☐Y ☐N ☑NA ☐NE |
| 3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT: | ☑Y ☐N ☐NA ☐NE |
| 4. QUALITY CONTROL PROCEDURES ADEQUATE: | ☑Y ☐N ☐NA ☐NE |
| 5. DUPLICATE SAMPLES ARE ANALYZED ≥10% OF THE TIME: | ☑Y ☐N ☐NA ☐NE |
| 6. SPIKED SAMPLES ARE ANALYZED ≥10% OF THE TIME: | ☑Y ☐N ☐NA ☐NE |
| 7. COMMERCIAL LABORATORY USED: | ☑Y ☐N ☐NA ☐NE |
| a. LAB NAME: **ETG Inc. (DMR)/ Pace Analytical (WET)** | |
| b. LAB ADDRESS: **1702 East Central Avenue, Suite 10, Bentonville, AR 72717/ 9608 Loiret Blvd., Lenexa, KS 66219** | |
| c. PARAMETERS PERFORMED: | |
| 8. BIOMONITORING PROCEDURES ADEQUATE: | ☑Y ☐N ☐NA ☐NE |
| a. PROPER ORGANISMS USED: | ☑Y ☐N ☐NA ☐NE |
| b. PROPER DILUTION SERIES FOLLOWED: | ☑Y ☐N ☐NA ☐NE |
| c. PROPER TEST METHODS AND DURATION: | ☑Y ☐N ☐NA ☐NE |
| d. RETESTS AND/OR TRE PERFORMED AS REQUIRED: | ☐Y ☐N ☑NA ☐NE |

## SECTION G: EFFLUENT/RECEIVING WATERS OBSERVATIONS

BASED ON VISUAL OBSERVATIONS ONLY — ☑S ☐M ☐U ☐NA ☐NE

DETAILS:

| OUTFALL #: | OIL SHEEN | GREASE | TURBIDITY | VISIBLE FOAM | FLOATING SOLIDS | COLOR | OTHER |
|---|---|---|---|---|---|---|---|
| 001 | None | None | None | Trace | None | Clear | -- |
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |

## SECTION H: SLUDGE DISPOSAL

SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS — ☑S ☐M ☐U ☐NA ☐NE

DETAILS:

1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY: ☑S ☐M ☐U ☐NA ☐NE
2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503: ☐S ☐M ☐U ☑NA ☐NE
3. FOR LAND APPLIED SLUDGE, TYPE OF LAND APPLIED TO: (E.G., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE): **Sent to landfill**

## SECTION I: SAMPLING INSPECTION PROCEDURES

SAMPLE RESULTS WITHIN PERMIT REQUIREMENTS — ☐S ☐M ☐U ☑NA ☐NE

DETAILS:

1. SAMPLES OBTAINED THIS INSPECTION: ☐Y ☐N ☑NA ☐NE
2. TYPE OF SAMPLE: ☐GRAB:__ ☐COMPOSITE:__ METHOD:__ FREQUENCY:
3. SAMPLES PRESERVED: ☐Y ☐N ☑NA ☐NE
4. FLOW PROPORTIONED SAMPLES OBTAINED: ☐Y ☐N ☑NA ☐NE
5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE: ☐Y ☐N ☑NA ☐NE
6. SAMPLE REPRESENTATIVE OF VOLUME AND NATURE OF DISCHARGE: ☐Y ☐N ☑NA ☐NE
7. SAMPLE SPLIT WITH PERMITTEE: ☐Y ☐N ☑NA ☐NE
8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED: ☐Y ☐N ☑NA ☐NE
9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT: ☐Y ☐N ☑NA ☐NE

## SECTION J: STORM WATER POLLUTION PREVENTION PLAN

STORM WATER MANAGEMENT MEETS PERMIT REQUIREMENTS — ☐S ☐M ☐U ☑NA ☐NE

DETAILS:

1. SWPPP UPDATED AS NEEDED:__ DATE OF LAST UPDATE: ☐Y ☐N ☑NA ☐NE
2. SITE MAP INCLUDING ALL DISCHARGES AND SURFACE WATERS: ☐Y ☐N ☑NA ☐NE
3. POLLUTION PREVENTION TEAM IDENTIFIED: ☐Y ☐N ☑NA ☐NE
4. POLLUTION PREVENTION TEAM PROPERLY TRAINED: ☐Y ☐N ☑NA ☐NE
5. LIST OF POTENTIAL POLLUTANT SOURCES: ☐Y ☐N ☑NA ☐NE
6. LIST OF POTENTIAL SOURCES AND PAST SPILLS AND LEAKS: ☐Y ☐N ☑NA ☐NE
7. ALL NON-STORM WATER DISCHARGES ARE AUTHORIZED: ☐Y ☐N ☑NA ☐NE
8. LIST OF STRUCTURAL BMPS: ☐Y ☐N ☑NA ☐NE
9. LIST OF NON-STRUCTURAL BMPS: ☐Y ☐N ☑NA ☐NE
10. BMPS PROPERLY OPERATED AND MAINTAINED: ☐Y ☐N ☑NA ☐NE
11. INSPECTIONS CONDUCTED AS REQUIRED: ☐Y ☐N ☑NA ☐NE

# FLOW CALCULATION SHEET

| | | | |
|---|---|---|---|
| Date: | **04/26/2018** | Time: | **10:44** |

| | | | |
|---|---|---|---|
| Head in Inches: | | Feet: | |

Type & Size of Primary Flow Measurement Device: 5' Rectangular Weir w/out end contractions

| | |
|---|---|
| Name & Model of Secondary Flow Measurement Device: | ISCO Teledyne Signature |
| Date of last Calibration of Secondary Flow Device: | 1/11/2018 |
| Recorded Flow at Date & Time Listed Above: | **3921 GPM** (Facility Flow Meter) |
| Calculated Flow at Date & Time Listed Above: | **2802 GPM** |

(Flow is calculated using flow charts in: ISCO Open Channel Flow Measurement Handbook-5th Edition)

$$\% \text{ Error} = \frac{\text{Recorded Value} - \text{Calculated Value}}{\text{Calculated Value}} \times 100$$

$$\% \text{ Error} = \frac{3921 - 2802}{2802} \times 100$$

$$\% \text{ Error} = \frac{1119}{2802} \times 100$$

$$\% \text{ Error} = 0.399 \times 100$$

$$\% \text{ Error} = \mathbf{39.9}\ \%$$

Comments: **% error may have been caused by changing flow rate during the check.**

## DMR Calculation Check

| **Reporting Period:** | **From** | **2018** (Year) | **03** (Month) | **01** (Day) | **To** | **2018** (Year) | **03** (Month) | **31** (Day) |
|---|---|---|---|---|---|---|---|---|

**Parameter Checked:** NH3-N

| | Loading | Concentration | |
|---|---|---|---|
| | Mass | Monthly | |
| | Mo. Avg. - lbs/day | Mo. Avg. - mg/l | 7-day Avg. - mg/l |
| **Reported Value:** | 44.5 | 1.3 | 3.7 |
| **Calculated Value:** | 44.5 | 1.3 | 3.7 |
| **Permit Value:** | 147 | 4.0 | 6.0 |

**If calculated value does not equal reported value, explain:**

## DMR Calculation Check

| **Reporting Period:** | **From** | **2017** | **10** | **01** | **To** | **2017** | **10** | **31** |
|---|---|---|---|---|---|---|---|---|
| | | **Year** | **Month** | **Day** | | **Year** | **Month** | **Day** |

**Parameter Checked:** **TSS**

| | **Loading** | **Concentration** | |
|---|---|---|---|
| | **Mass** | **Monthly** | |
| | **Mo. Avg. - lbs/day** | **Mo. Avg. - mg/l** | **7-day Avg. - mg/l** |
| **Reported Value:** | **24.8** | **1.4** | **1.9** |
| **Calculated Value:** | **24.8** | **1.4** | **1.9** |
| **Permit Value:** | **734** | **20** | **30** |

**If calculated value does not equal reported value, explain:**

| Office of Water Quality Photographic Evidence Sheet | | | | | |
|---|---|---|---|---|---|
| Location: | **Siloam Springs WWTP** | | | | |
| Photographer: | **Garrett Grimes, District 1 Inspector** | Date: | **04/26/2018** | Time: | **9:43** |
| Witness: | | | | Photo #: | **1** |
| Description: | **Leaks on the east primary clarifier (1 of 3)** | | | | |


| Photographer: | **Garrett Grimes, District 1 Inspector** | Date: | **04/26/2018** | Time: | **9:43** |
|---|---|---|---|---|---|
| Witness: | | | | Photo #: | **2** |
| Description: | **Leaks on the east primary clarifier (2 of 3)** | | | | |

| Office of Water Quality Photographic Evidence Sheet | | | | | |
|---|---|---|---|---|---|
| Location: | **Siloam Springs WWTP** | | | | |
| Photographer: | **Garrett Grimes, District 1 Inspector** | Date: | **04/26/2018** | Time: | **9:45** |
| Witness: | | | | Photo #: | **3** |
| Description: | **Leaks on the east primary clarifier (3 of 3)** | | | | |


| Photographer: | **Garrett Grimes, District 1 Inspector** | Date: | **04/26/2018** | Time: | **9:49** |
|---|---|---|---|---|---|
| Witness: | | | | Photo #: | **4** |
| Description: | **Leak on the sludge thickener tank.** | | | | |

| **Office of Water Quality Photographic Evidence Sheet** | | | | | |
|---|---|---|---|---|---|
| Location: | **Siloam Springs WWTP** | | | | |
| Photographer: | **Garrett Grimes, District 1 Inspector** | Date: | **04/26/2018** | Time: | **11:15** |
| Witness: | | | | Photo #: | **5** |
| Description: | **Close up from Photo #4.** | | | | |


| Photographer: | **Garrett Grimes, District 1 Inspector** | Date: | **04/26/2018** | Time: | **11:14** |
|---|---|---|---|---|---|
| Witness: | | | | Photo #: | **6** |
| Description: | **Another leak on the sludge thickener tank.** | | | | |

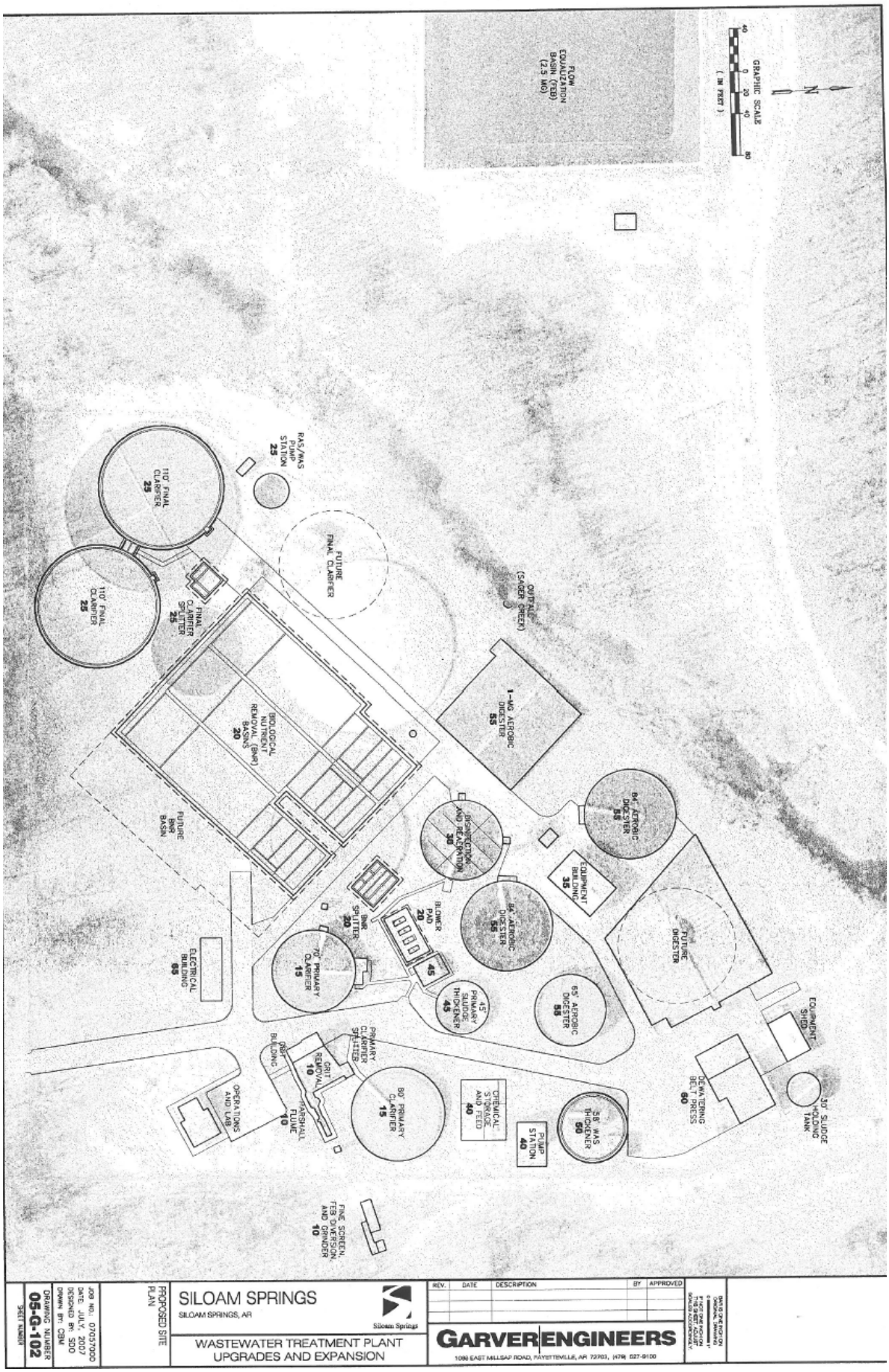
| **Office of Water Quality Photographic Evidence Sheet** | | | | | |
|---|---|---|---|---|---|
| Location: | **Siloam Springs WWTP** | | | | |
| Photographer: | **Garrett Grimes, District 1 Inspector** | Date: | **04/26/2018** | Time: | **10:53** |
| Witness: | | | | Photo #: | **7** |
| Description: | **Vegetation growing in the sludge drying beds.** | | | | |


| Photographer: | **Garrett Grimes, District 1 Inspector** | Date: | **04/26/2018** | Time: | **10:43** |
|---|---|---|---|---|---|
| Witness: | | | | Photo #: | **8** |
| Description: | **Photo of flow meter taken at 10:43. Flow appears to be 3230 GPM.** | | | | |

| **Office of Water Quality Photographic Evidence Sheet** | | | | | |
|---|---|---|---|---|---|
| Location: | **Siloam Springs WWTP** | | | | |
| Photographer: | **Garrett Grimes, District 1 Inspector** | Date: | **04/26/2018** | Time: | **10:44** |
| Witness: | | | | Photo #: | **9** |
| Description: | **Photo of flow meter taken at 10:4. Flow appears to be 4264 GPM.** | | | | |


| Photographer: | **Garrett Grimes, District 1 Inspector** | Date: | **04/26/2018** | Time: | **11:07** |
|---|---|---|---|---|---|
| Witness: | | | | Photo #: | **10** |
| Description: | **Empty containers of sodium chlorite. Note the bottoms of some of the containers appear corroded and the surrounding soil is discolored** | | | | |

Attachment 1: Schematic of Siloam Springs Wastewater Treatment Plant.



| | |
|---|---|
| **From:** | Tom Myers |
| **To:** | Grimes, Garrett; Water-Inspection-Report |
| **Cc:** | Phillip Patterson; Steven Gorszczyk; Renea Ellis; Janet Hall |
| **Subject:** | Siloam Springs WWTP Inspection AFIN 04-00106 Permit No AR0020273 |
| **Date:** | Wednesday, June 13, 2018 2:55:32 PM |
| **Attachments:** | Response Letter ADEQ June 13 2018.pdf |

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Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock
Arkansas 72118-5317

RE: Inspection April 26, 2018 Garrett Grimes District 1 Field Inspector
Siloam Springs; AFIN 04-00106 Permit No. AR0020273

This is a response to Inspection conducted April 26, 2018 see attached supporting documentation.

Sincerely,

Thomas A. Myers
Wastewater Superintendent
975 Anderson Avenue Zip 72761
Plant: 479-524-5623
Cell: 479-228-0934
tmyers@siloamsprings.com

CITY OF Siloam Springs

June 13, 2018

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

**CITY OF SILOAM SPRINGS**
**RESPONSE TO ADEQ INSPECTION REPORT (APRIL 26, 2018)**

The Arkansas Department of Environmental Quality ("ADEQ" or "the Department") conducted an inspection of the City of Siloam Springs ("the City") wastewater treatment facility ("WWTF") on April 26, 2018. The Department submitted its findings from the inspection in a report ("Inspection Report") to the City dated May 24, 2018, which the City received on May 29, 2018. The Inspection Report contains list of Summary of Findings. The Inspection Report requests a written response to Summary of Findings June 14, 2018. This letter is intended to respond to each item(s) contained in the May 24, 2018, Inspection Report.

**SUMMARY OF FINDINGS**

The following violations were noted during the inspection:

1.) Operation and Maintenance; Part II, Section B. 1.A. of the permit.

a) Leaks were observed on the east primary clarifier (Photos #1-#3, Attachment 1).

b) Leaks were observed on the sludge thickener (Photos #4-#6, Attachment 1).

c) Established vegetation was observed growing in sludge drying beds (Photo #7).

Response: The City has repaired all reported observed leaks on the east primary clarifier (Photos #1-#3, Attachment 1-3) and on the primary sludge thickener (Photos#4, Attachment 4). Vegetation growing in the sludge drying beds has been removed (Photos #5, Attachment 5).

2.) Flow Measurement; Part II, Section C.2. of the permit.

a) The flow meter calibration check conducted during the inspection showed an error of 40% (Refer to Page 7). However, it appears the check may have been influenced by rapidly changing flow (Photos #8-#9). The City of Siloam springs should verify that the facility flow meter is functioning properly and submit appropriate records.

Response: The City conducts weekly flow calibration tests to ensure accuracy of flow meter. In addition, a private firm calibrates all plant flow meters. As illustrated in Photo #10 of the report, the last certification was completed on 1/11/2018. However, since there was concern with the accuracy, another new inspection was conducted by the flow meter manufacture representative on June 5, 2018. The meter was recertified at that time. See attachment (Photo #6-#7, Attachment 6) which illustrates the certification sticker on the flow meter. Also included is the weekly calibration sheet at effluent flow monitoring station.

**GENERAL COMMENTS**

Several containers of a Sodium Chlorite were observed on the grounds near the dewatering belt press (Photo #10, Attachment 1). The containers appeared mostly empty, however, they were marked corrosive and the bottoms of several of the containers were corroded with an orange coloration on the surrounding soil (Photo #10). The City of Siloam Springs should verify that these containers are not leaking any remaining Sodium Chlorite and store them in a manner that does not risk spills to the surrounding environment.

Response: The City has removed all containers from outside of the belt press building. The area has been cleaned and the empty containers were removed from plant. Those which contained Sodium Hypochlorite were stored in an enclosed building for future use when needed. See (Photo's #8-#9), attachment 8 and 9.

If you have any questions or need additional information, please do not hesitate to contact me at 479-238-0927.

Sincerely,

Thomas A. Myers
Water Pollution Control Facility Superintendent
tmyers@siloamsprings.com

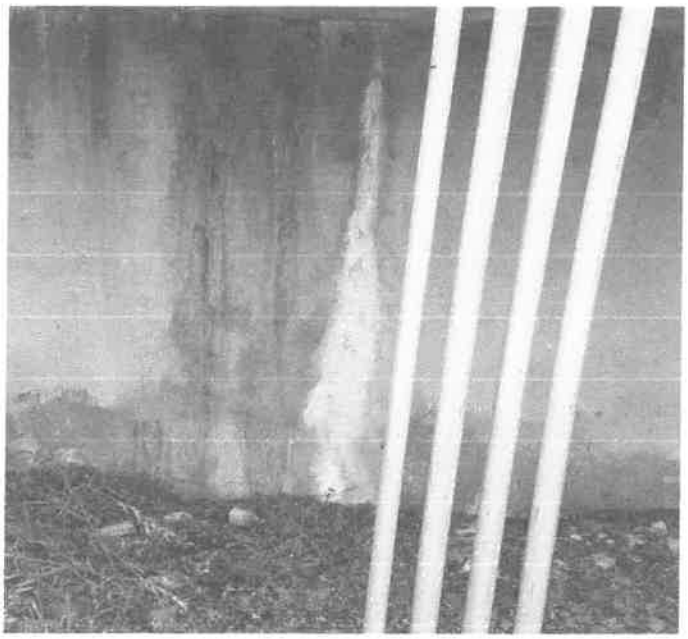
cc: Phillip Patterson, City Administrator
Steve Gorszczyk, Public Works Director
Renea Ellis, City Clerk
Wastewater File
Garrett Grimes, District 1 Field Inspector

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

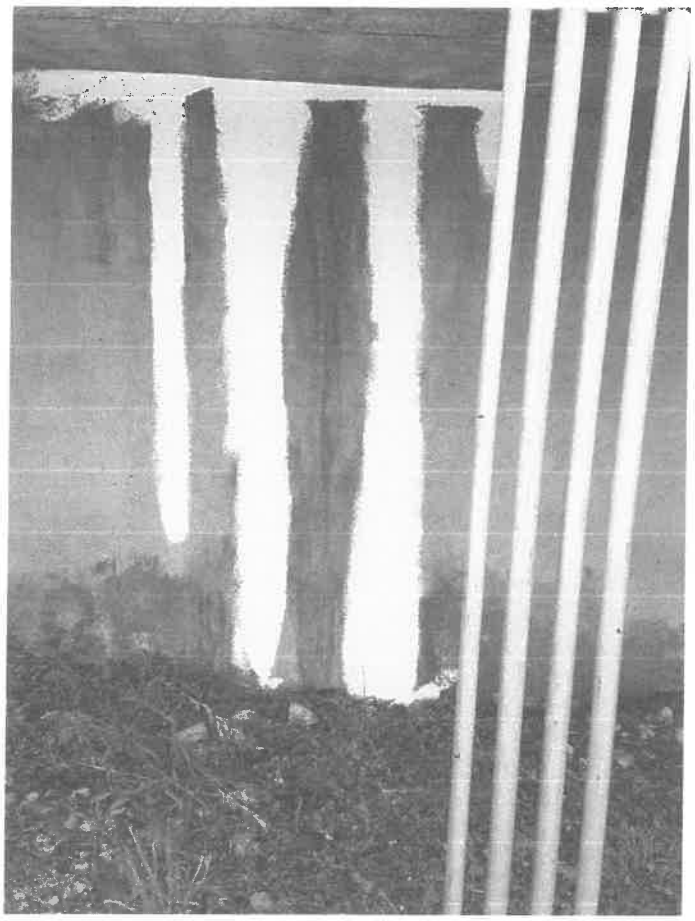
SUMMARY OF FINDINGS RESPONSE

1.) OPERATION AND MAINTENANCE

Reference A in Inspection Summary of Findings.



*Picture 1 Primary Clarifier #1 Leaks as noted by ADEQ report*



*Picture 2 Primary Clarifier #1 Epoxy Injection and rubber base coating.*

*Picture 3 Primary Clarifier 1 Repair Photo*

Reference B in Inspection Summary of Findings.

*Picture 4 Sludge-Primary Thickener Repair Photo*

Reference C in Inspection Summary of Findings.

*Picture 5 Sludge Drying Beds Cleaned Vegetation Removed*

SUMMARY OF FINDINGS RESPONSE

2.) FLOW MEASUREMENT

A.) Flow Calibration Photo and Document


*Picture 6 New Inspection Certification.*

0 934

**SILOAM SPRINGS WASTEWATER PLANT**
**EFFLUENT FLOW METER CALIBRATION LOG**

| DATE | TIME | CAL GAUGE READING | OPER | REC METER READING | OPER | % ERROR |
|---|---|---|---|---|---|---|
| 1/5/18 | 1014 | 1820 | JLH | 1750 | HA | 3.85 |
| 1/9/18 | 0918 | 1290 | JLH | 1353 | TB | 4.88 |
| 1/16/18 | 1421 | 1228 | JLH | 1290 | JM | 5.05 |
| 1/22/18 | 0904 | 1526 | JLH | 1591 | JM | 4.26 |
| 2/1/18 | 1002 | 1417 | JLH | 1947 | TB | 8.40 |
| 2/5/18 | 0938 | 1880 | JLH | 1929 | HA | 2.50 |
| 2/13/18 | 1021 | 1962 | JLH | 2034 | TB | 3.67 |
| 2/19/18 | 1052 | 2107 | JLH | 2181 | JM | 3.51 |
| 3/1/18 | 0730 | 1353 | JLH | 1290 | TB | 4.66 |
| 3/5/18 | 1044 | 2408 | JLH | 2563 | HA | 6.05 |
| 3/12/18 | 0923 | 1682 | JLH | 1750 | TB | 4.04 |
| 3/19/18 | 1322 | 1750 | JLH | 1820 | JM | 4.00 |
| 3/28/18 | 1258 | 5247 | JLH | 4951 | JM | 5.64 |
| 4/2/18 | 0953 | 3473 | JLH | 3386 | HA | 2.51 |
| 4/9/18 | 1047 | 2563 | JLH | 2485 | TB | 3.24 |
| 4/16/18 | 1256 | 2181 | JLH | 2331 | JM | 6.88 |
| 4/30/18 | 1014 | 1228 | JLH | 1290 | HA | 5.05 |
| 5/7/18 | 0923 | 1547 | JLH | 1682 | TB | 8.73 |
| 5/14/18 | 1148 | 1417 | JLH | 1481 | JM | 4.57 |
| 5/23/18 | 1320 | 1820 | JLH | 1682 | TB | 7.58 |
| 5/29/18 | 1024 | 1290 | JLH | 1353 | HA | 4.88 |

% ERROR = (RECORDED VALUE - CALCULATED VALUE)/CALCULATED VALUE X 100

Reference: Isco Open Channel Flow Measurement Handbook

*Picture 7 Weekly Calibration Sheet Plant Effluent.*

GENERAL COMMENTS

*Picture 8 Tote Storage Area Cleaned Removed Old Tanks and Applied Oil Dry Compound.*

GENERAL COMMENTS

*Picture 9 Totes Stored in Building with drain capture system.*

| | |
|---|---|
| **From:** | Tom Myers |
| **To:** | McConnell, Melissa; Grimes, Garrett |
| **Cc:** | Steven Gorszczyk; Janet Hall |
| **Subject:** | RE: _EXTERNAL_Read: Siloam Springs WWTP Inspection AFIN 04-00106 Permit No AR0020273 |
| **Date:** | Thursday, June 14, 2018 7:57:47 AM |

Melissa,

In addition to the email correspondence, a hard copy of the response letter was sent over night to ADEQ in North Little Rock.

Sincerely,

Thomas A. Myers
Wastewater Superintendent
975 Anderson Avenue Zip 72761
Plant: 479-524-5623
Cell: 479-228-0934
tmyers@siloamsprings.com

-----Original Message-----
From: McConnell, Melissa <MCCONNELL@adeq.state.ar.us>
Sent: Thursday, June 14, 2018 7:00 AM
To: Tom Myers <tmyers@siloamsprings.com>
Subject: _EXTERNAL_Read: Siloam Springs WWTP Inspection AFIN 04-00106 Permit No AR0020273

ADEQ
ARKANSAS
Department of Environmental Quality

June 20, 2018

Phillip Patterson, City Admin.
City of Siloam Springs
P.O. Box 80, 400 Broadway
Siloam Springs, AR 72761

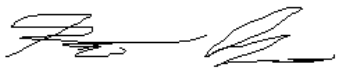
RE: Adequate Response to Inspection
AFIN: 04-00106 Permit No.: AR0020273

Dear Mr. Patterson:

The Department has received your June 13, 2018, response to the inspection conducted on April 26, 2018. Your response adequately addresses the request in the Summary of Findings section of the report. Acceptance of this response by the Department does not preclude any future enforcement action deemed necessary at this site or any other site.

If I need further information concerning this matter, I will contact you. Thank you for your attention to this matter. If I can be any assistance please feel free to contact me at grimesg@adeq.state.ar.us or 479.267.0811 ext. 16.

Sincerely,



Garrett Grimes
District 1 Field Inspector
Office of Water Quality