

ADEQ

ARKANSAS
Department of Environmental Quality

September 11, 2019

Mr. Phillip R. Patterson, City Administrator
City of Siloam Springs Pollution Control
400 North Broadway
Siloam Springs, AR 72761

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

Dear Mr. Patterson:

On August 20, 2019, I performed a Pretreatment Compliance 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.

No violations were noted at the time of the inspection. Please refer to the attached inspection report for any comments. If I can be of any assistance, please contact me at Bolenbaugh@adeq.state.ar.us or 501-682-0659.

Sincerely,



Jason Bolenbaugh
Compliance Branch Manager
Office of Water Quality

CC: Mr. Thomas Meyers, WW Superintendent, tmyers@siloamsprings.com



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

WATER DIVISION INSPECTION REPORT

AFIN: 04-00106	PERMIT #: AR0020273	DATE: 8/20/2019
COUNTY: 04 Benton	PDS #: 109285	MEDIA: WN
GPS LAT:	LONG:	LOCATION: *****

FACILITY INFORMATION	INSPECTION INFORMATION
NAME: City of Siloam Springs LOCATION: 975 Anderson Road CITY: Siloam Springs	FACILITY TYPE: ***** INSPECTOR ID#: 83321 S - State FACILITY EVALUATION RATING: *** INSPECTION TYPE: Pretreatment Compliance
	DATE(S): 8/20/2019 ENTRY TIME: 09:00 EXIT TIME: 15:30 PERMIT EFFECTIVE DATE: 10/1/2007 PERMIT EXPIRATION DATE: 9/30/2012
RESPONSIBLE OFFICIAL	
NAME / TITLE: Mr. Phillip R. Patterson / City Administrator COMPANY: City of Siloam Springs Pollution Control MAILING ADDRESS: 400 North Broadway CITY, STATE, ZIP: Siloam Springs AR 72761 PHONE & EXT. / FAX: 479-238-0907 / EMAIL: ppatterson@siloamsprings.com	FAYETTEVILLE SHALE RELATED: N FAYETTEVILLE SHALE VIOLATIONS: N
CONTACTED DURING INSPECTION: No	INSPECTION PARTICIPANTS
	NAME/TITLE/PHONE/FAX/EMAIL/ETC.: Mr. Thomas Meyers, WW Superintendent Mr. Tony Brown, WW Operator (Class III) Cole Southerland, ADEQ Inspector

AREA EVALUATIONS

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


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

SUMMARY OF FINDINGS

No violations were noted at the time of the inspection. The DEQ greatly appreciates the cooperation of Mr. Meyers, Mr. Brown, and the staff members at the Gates Corporation and Simmons Food, Incorporated. It is apparent city personnel have developed a good working relationship with each SIU.

GENERAL COMMENTS

- NPDES Permit AR0020273 was deemed administratively complete in April, 2012.
- During the inspection site visits were made to the Gates Corporation and Simmons Food, Incorporated. The Industrial User checklist is included within this report. A separate Industrial User inspection has also been completed for each facility.
- All SIUs are required on an annual basis to submit flow meter certifications and complete a new Industrial Waste Discharge Questionnaire (i.e. IU Survey).
- The Del Monte Plant (a.k.a. Sager Creek, Allens Canning) has ceased operations and is no longer a SIU within the pretreatment program.
- All sludge is disposed of at the Washington County landfill in Tontitown.
- The City uses a permit as the control mechanism and all were current. Due to violations of discharge limitations the Simmons Food, Incorporated facility is required to renew their permit annually.
- The City inspects and samples each SIU at least once/year. Inspections are typically unannounced. All inspection reports were thorough and all sampling documentation was complete and accurately recorded.
- No upsets have occurred at the plant due to an SIU discharge since September, 2015.
- The City has an ordinance in place to adequately address any type of permit violation or unpermitted discharge to the POTW. The City has not noticed any unpermitted discharges to the POTW and they have implemented a Fats, Oil, and Grease (FOG) program.

INSPECTOR'S SIGNATURE: ←Click text to left to add signature	-Inspector Name	DATE:
SUPERVISOR'S SIGNATURE: 	Jason Bolenbaugh	DATE: 9/9/2019

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY

PRETREATMENT COMPLIANCE INSPECTION (PCI) REPORT

Name of Municipality: City of Siloam Springs

AFIN Number: 04-00106

NPDES Permit Number(s): AR0020273, ARR000276

Program Tracked under NPDES Permit Number: AR0020273, ARR000276

Fact Sheet Preparation Date: August 14, 2007

Date of Last PCI/Audit: September 17, 2015 / June 18, 2013

Date of Last Annual Report: August 30, 2018

Name of Inspector: Jason R. Bolenbaugh

Date PCI Performed: August 20, 2019

Name, Title, and Telephone Number of Facility Representative:

Mr. Thomas Meyers, Wastewater Superintendent, 479-524-5623

Mr. Tony Brown, Wastewater Operator III, 479-524-5623

Name and Title of Other Participants: _____

Cole Southerland, OWQ Inspector, DEQ

Number of IUs Visited: 2

Name(s) of IUs Visited: _____

Gates Rubber (Categorical), Simmons Food (Non-Categorical)

AN IU SITE VISIT FORM SHOULD BE COMPLETED FOR EACH IU VISITED

NOTE: ANY QUESTION PRINTED IN ALL CAPS AND BOLD PRINT INDICATED A REGULATORY REQUIREMENT AND MUST BE ANSWERED FOR THE PCI REPORT TO BE COMPLETE. A NO ANSWER TO ONE OF THESE QUESTIONS SHOULD RESULT IN AN UNSATISFACTORY RATING.

Form approved July 1989

A. INDUSTRIAL USER SURVEY

1. List any Significant Industrial Users (SIUs) which have been added or deleted from the program since the last audit or inspection. Del Monte Plant is closed.
-
2. Has ADEQ or EPA been notified of these changes? Yes
3. **HAS THE INDUSTRIAL USER SURVEY BEEN KEPT UPDATED?** Yes
4. What procedures are being used to update the IU Survey?
Each SIU is required to complete a questionnaire on an annual basis. The questionnaire serves as the IU survey. The survey will include any information about change in processes.
-
5. Total number of Significant Industrial Users, according to the definition used by the POTW. (This number must be greater than or equal to the answer to question 6) 3
6. Number of Categorical Industrial Users: 1
7. How does the POTW determine the appropriate categorical standards to apply to an IU? IU survey, 40 CFR, and local limits.
-
8. List all categorical IUs discharging under the approved (such program. Include the name of the IU, the regulatory category as Metal Finishing), and the regulated process (phosphating, zinc plating, etc.) Additional listings can be made in the comments section if necessary.
- | | | |
|---------------------|-----------------------------|--------------------|
| Name of IU: | Category: | Regulated Process: |
| <u>Gates Rubber</u> | <u>Rubber Manufacturing</u> | |
-

B. LOCAL LIMITS

1. IS THE POTW APPLYING LOCAL LIMITS WHICH HAVE BEEN APPROVED BY ADEQ OR EPA? Yes. Some report only pollutants like total phosphorus but the requirement helps the POTW determine if an issue us due to an addition of process within the facility.

2. Describe any apparent problems with the local limits.
None

3. How often are pollutant scans of POTW influent, effluent, and sludge performed by the POTW? Does this fulfill the requirements of the approved program (as described in the fact sheet) and part III of the NPDES permit?

Pollutant:	Frequency:	Requirement in Permit:	Requirement in Program:	Comments:
Metals:				
Influent:	<u>Quarterly</u>	<u>Quarterly</u>	<u>Quarterly</u>	
Effluent:	<u>Quarterly</u>	<u>Quarterly</u>	<u>Quarterly</u>	
Sludge:	<u>Quarterly</u>			
Organics:				
Influent:	<u>Annually</u>	<u>Annually</u>	<u>Annually</u>	
Effluent:	<u>Annually</u>	<u>Annually</u>	<u>Annually</u>	
Sludge:	<u>Semi-Ann.</u>			

4. Have there been any inhibitions or upsets at the POTW (since the last PCI of Audit) which were believed to be caused by industrial discharges? If so, describe the action taken by the City to ensure that the incident would not recur. Were these actions effective?
Yes, on September 29, 2015 site visits were conducted at the WWTP due to discharges from Sager Creek Foods(now Del Monte). The upset of the plant resulted in effluent limitation violations and a fish kill.

C. INDUSTRIAL USER CONTROL MECHANISM

1. Is the POTW using the type of control mechanism (permit, agreement, etc.) required by the approved program? Permit

2. How many IU permits (or other control documents) have been issued? Three

3. **DO ALL SIGNIFICANT IUS HAVE CURRENT (UNEXPIRED) CONTROL DOCUMENTS? IF NOT, LIST ALL UNPERMITTED SIUS, THE DATE OF EXPIRATION OF THEIR PREVIOUS PERMIT (IF APPLICABLE), AND THE REASON FOR DELAY IN ISSUING THE REQUIRED DOCUMENT.**
Yes, all three have permits.

4. Does the control document contain the following items?
An expiration date: Yes

Discharge limitations: Yes

If the program requires self-monitoring by the IUs, do the Permits contain:

IU self-monitoring requirements: Yes

IU reporting requirements: Yes

5. Indicate which of the following recommended standard conditions are contained in the control documents:

Sample location: Yes - Part I

Type of sample: Yes - Part I

Monitoring frequency: Yes - Part I

Bypass prohibition: Yes - Part II, Section B, Condition 4

Right of entry: Yes - Part II, Section B, Condition 12

Nontransferability: Yes - Part II, Section D, Condition 3

Revocation clause: Yes - Part II, Section A, Condition 3

Penalty Provisions: Yes - Part II, Section A Condition 2

Slug load notification: Yes - Part II, Section B, Condition 5

Notification of process change: Yes, Part II, Section D, Condition 1

D. MONITORING OF IUS BY POTW (40 CFR 403.8(f)(2)(v))

1. Indicate current inspection and sampling frequency and program requirement below:

	Current frequency:	Program Requirement:
Sampling:		
categorical IUs	<u>Annually</u>	<u>Annually</u>
other SIUs	<u>Annually</u>	<u>Annually</u>
Inspection:		
categorical IUs	<u>Annually</u>	<u>Annually</u>
other SIUs	<u>Annually</u>	<u>Annually</u>

2. **HAS EACH SIU BEEN INSPECTED AND SAMPLED AT THE FREQUENCY REQUIRED BY THE APPROVED PROGRAM?** Annual inspections

3. Are inspections announced or unannounced? Unannounced

4. Are records kept of each inspection? Yes

5. Does the inspection report contain an adequate description of the following:

Date and time of inspection: Yes

Officials present: Yes

Inspection of chemical storage areas: Yes

Description of regulated processes, categorical waste streams, and discharge location of these waste streams: Yes

Inspection of the pretreatment facilities: Yes

Review of self-monitoring records: Yes

Observation of IU self-monitoring procedures: Yes

Verification that approved analytical techniques are used: Yes

Verification of IU flow measurement (where required): Yes

6. Overall adequacy of inspection documentation: The inspection forms include all necessary information and thoroughly completed.

7. DOES THE POTW SAMPLE IUS FOR ALL POLLUTANTS REGULATED IN THEIR PERMITS? (IT IS NOT NECESSARY TO SAMPLE FOR ALL POLLUTANTS EVERY TIME, BUT IT MUST BE DONE PERIODICALLY). **Yes, at least annually.**
-
8. Are analyses performed in accordance with EPA-approved methods (40 CFR 136)? **Yes**
-
9. Are sampling and flow monitoring equipment properly maintained? **Yes, flow calibrations required annually**
-
10. Is the POTW keeping proper field notes and chain of custody forms? **Yes**
-
11. Is the sampling location representative of the discharge to the collection system? **Yes**
-
12. Are sampling locations identified in POTW records? **Yes**
-
13. Are sampling services available in an emergency? **Yes**
-
14. What are the POTW's procedures for tracking receipt and review of IU reports, such as BMR's, semi-annual reports, progress reports, bypass reports, and self-monitoring reports? **The POTW will follow-up with a letter, email, or text to each facility.**
-
15. ARE SELF-MONITORING REPORTS REVIEWED TO VERIFY THAT ANALYSES WERE PERFORMED FOR ALL REGULATED PARAMETERS, AND TO EVALUATE COMPLIANCE WITH EFFLUENT LIMITS? **Yes**
All files were complete when reviewed.
-
16. IF VIOLATIONS ARE FOUND IN REPORTS, DOES THE POTW RESPOND TO ALL VIOLATIONS? **Yes. The IU must supply a 24-hour report to the POTW and the POTW will acknowledge and respond. The POTW will send a letter or request remediation.**
-

17. What are the POTW's procedures for following up violations?
Will request corrective actions and a written report or
conduct a follow-up inspection if necessary.

18. **HAS THE POTW REVIEWED BMRS FOR COMPLIANCE WITH 40 CFR**
403.12(b)?: Not applicable at this time.

Review a Baseline Monitoring Report from the POTW's file,
and indicate which of the following items can be identified
in the BMR:

Name and address: N/A

Other environmental permits held: N/A

Description of operations: N/A

Process flow diagrams: N/A

Flow measurements: N/A

Measurements of regulated pollutants: N/A

Certification of compliance by the IU: N/A

Compliance schedule (if needed): N/A

E. Enforcement

1. HAS THE POTW IMPLEMENTED ENFORCEMENT RESPONSE PROCEDURES TO ADEQUATELY ADDRESS EVERY IU VIOLATION OF PRETREATMENT STANDARDS AND REQUIREMENTS? Yes. The City has developed Ordinance Number 12-05. Enforcement information can be found in Divisions 11 and 12 of the Ordinance.

2. How does the POTW respond to the following violations?
Effluent limitations: Written notification, email, telephone

Late reports: Written notification, email, telephone

Unpermitted discharges: Witten notification, Corrective Measures request, Cease and Desist, Fines, Hearing, etc.

Slug loads or spills: Witten notification, Corrective Measures request, Cease and Desist, Fines, Hearing, etc.

3. IS THE LIST OF SIGNIFICANT VIOLATORS PUBLISHED BY THE POTW DEVELOPED IN ACCORDANCE WITH EPA REGION VI CRITERIA FOR SIGNIFICANT VIOLATING INDUSTRIAL USER (DATED AUGUST 22, 1985)? Yes

4. List the SIUs which have met the criteria for Significant Violator within the last 12 months, and describe the enforcement action which has been taken by the POTW. If construction is required, please indicate whether the IU has been placed on an enforceable compliance schedule.
There have not been an in the last 12 months.

5. Comments on the POTW's enforcement procedures:
The City carefully monitors their SIUs and continue to take the appropriate steps to ensure each violation is documented and notification is given to the SIU.

F. POTW'S PRETREATMENT ORGANIZATION STRUCTURE

1. Is the program structure essentially the same as that presented in the approved pretreatment program? Yes.

2. Are staffing levels adequate? Yes

3. Are the responsible officials familiar with the approved program? Yes

G. MULTIJURISDICTIONAL ISSUES

1. List any IUs which are located outside of the jurisdictional area of the POTW:
None

2. Does the POTW have adequate procedures for controlling IUs located outside its jurisdictional area? N/A

3. Does the POTW have copies of permits for IUs in other cities? N/A

4. Have any of these IUs met the criteria for Significant Violator? If so, have they been published by the POTW in its annual list of Significant Violators? N/A

5. Comments on multijurisdictional issues: N/A

PRETREATMENT COMPLIANCE INSPECTION
IU SITE VISIT FORM

Name of Industry: **Gates Corporation**

POTW Name: **City of Siloam Springs (AR0020273)**

Industry Contacts: **Charles Clay, HSE Manager**

Date and Time of Visit: **August 20, 2019 at 13:00**

Description of Manufacturing Process:

Processing of rubber slab, building of rubber belts, curing of rubber belts, grinding of rubber belts, and packaging of rubber belts.

Sources of Process Wastewater:

Cooling tanks for slab - water soluble lube and normal cleaning detergent and grease.

Categorical Industry? **Yes**

Basis for Limits: **40 CFR 428 & Local Limits**

Point of Application: **Prior to discharge to POTW.**

Description of Pretreatment Equipment and Procedures:

Oil and water separation only. Approximately 200 - 250 gallons Are pumped every two weeks from the separator.

Spill Prevention and Solvent Management Procedures:

The facility maintains secondary containment around the chemical storage building, hazardous waste storage building, and the oil and water separation structure. The facility maintains spill kits within both storage areas. The facility has sealed about 85 of 110 floor drains. New oil storage container has a 1,000 gallon secondary containment structure.

Sampling Location and Equipment:

The sampling location is adequate. The contracted sampling lab Brings in their own composite sampler. The IU conducts annual Flow calibration checks per their permit but also conducts their Own calibration checks on a weekly basis.

PRETREATMENT COMPLIANCE INSPECTION
IU SITE VISIT FORM

Name of Industry: Simmons Foods Inc.

POTW Name: City of Siloam Springs

Industry Contacts: Andy Brasher, EHS Manager
Bill Paczowski, WW Superintendent

Date and Time of Visit: August 20, 2019 at 14:00

Description of Manufacturing Process:
Three plants are at this site that produce final products from
the processing of fresh meat products.

Sources of Process Wastewater:

There are three plants that send wastewater to the pretreatment Unit.
Plant 1 uses fresh meat products with specialty added products to
produce jerky treats for the pet food industry. Plant 2 is the Simmons
Feed Ingredients that receives fresh and frozen meats that are ground
and cooked with direct steam to manufacture a shelf stable meat
ingredient for the pet food industry. Plant 3 is a further processing
facility with portioning and individually froze processes

Categorical Industry? No

Basis for Limits: Local Limits

Point of Application: Prior to discharge to POTW

Description of Pretreatment Equipment and Procedures:

Wastewater is screened and sent to the EQ basin. Screenings are handled
as solid waste. The EQ will be pumped through SAF/DAF 1 to further
remove solids. SAF 1 is pumped to a 250,000 gallon Biological Reactor
(BR) that mixes liquor bacteria to allow for the reduction of BOD. The
BR has fine bubble diffusers to provide aeration. The BR is pumped to
SAF 2 to remove mixed liquor and other solids before being discharged to
the POTW. Solids removed from both SAFs are sent to a tank and land
Applied by Nebo Services.

Spill Prevention and Solvent Management Procedures:

An accidental spill prevention plan has been developed by the facility.
Any spills are required to be remediated immediately and all spills of
any consequence will be directed to the City of Siloam Springs

Sampling Location and Equipment:

Sampling location is located within the pretreatment building.

**The contract laboratory will set up a refrigerated composite
sampler during sampling events.**

PPETS CODE SHEET
 PRETREATMENT COMPLIANCE INSPECTION (PCI)

		CODE
INSPECTOR'S NAME:	<u>Jason Bolenbaugh</u>	
NAME OF FACILITY:	<u>City of Siloam Springs</u>	
PERMIT NUMBER USED TO TRACK PROGRAM:	<u>AR0020273</u>	NPID
DATE OF PCI:	<u>August 20, 2019</u>	DTIA

PPETS WENDB DATA ELEMENTS

NUMBER OF SIGNIFICANT IUS (SIUS):	<u>3</u>	SIUS
NUMBER OF CATEGORICAL IUS:	<u>1</u>	CIUS
SIUS NOT SAMPLED OR INSPECTED BY POTW:	<u>0</u>	NOIN
SIUS WITHOUT CONTROL MECHANISM:	<u>0</u>	NOCM
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH STANDARDS OR REPORTING:	<u>0</u>	PSNC
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH SELF-MONITORING REQUIREMENTS:	<u>0</u>	MSNC
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH SELF-MONITORING AND NOT INSPECTED OR SAMPLED BY POTW:	<u>0</u>	SNIN