



ARKANSAS  
Department of Environmental Quality

September 15, 2009

Dwayne Allen, Public Works Director  
City of Eureka Springs  
3174 East Van Buren  
Eureka Springs, AR 72632

RE: AFIN: 08-00036

NPDES Permit No.: AR0021865

Dear Mr. Allen:

On August 4, 2009, I performed a routine compliance sample 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 thereunder. This inspection revealed the following violations:

- The permitted discharge limit of 7.5 lbs/d for phosphorous is routinely exceeded. All other parameters are typically below permitted limits. Section D.6.b(3) of the permit requires that violations of a maximum daily discharge limitation be reported in writing to the Department.
- During the inspection, samples of the treated effluent were collected and analyzed by the ADEQ laboratory. A fecal coliform result of 1000 cfu/100 ml was obtained from the sample. The high value indicates that the UV sterilization of the effluent is not effective. A review of Discharge Monitoring Reports during the inspection indicates consistently low fecal coliform concentrations in the treated effluent. I encourage you to evaluate the integrity of the UV sterilization system as well as the sampling procedures and sample holding times for the contract laboratory.

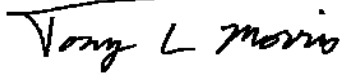
The above items require your immediate attention. Please submit a written response to the findings to the attention of Cindy Garner, Water Division Enforcement Section of ADEQ. This response should contain detailed documentation describing the course of action taken to correct the item noted. This corrective action should be completed as soon as possible, and the written response is due by September 25, 2009. For additional information you may contact the Enforcement Section by telephone at 501-682-0639 or by fax at 501-682-0910.

I appreciate the improvements to the plant noted during the inspection. My last site visits have documented steady improvement in the physical structure and operation of the plant.

DwayneAllen, Eureka Springs Public Works  
September 10, 2009  
Page 2

If you have any questions or I can be of any assistance, please contact me at 870-446-2770 or by e-mail at [morris@adeq.state.ar.us](mailto:morris@adeq.state.ar.us).

Sincerely,

A handwritten signature in black ink that reads "Tony L. Morris". The signature is written in a cursive style with a horizontal line above the first few letters.

Tony L. Morris  
District 2 Field Inspector  
ADEQ Water Division

cc: Water Division Enforcement Branch  
Water Division Permits Branch



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

## NPDES Compliance Inspection Report

Form Approved  
OMB No. 2040-0003

### Section A: National Data System Coding

Transaction Code	NPDES	Yr/Mo/Day	Inspec. Type	Inspector	Fac. Type																				
1 <b>N</b> 2 <b>5</b> 3 <b>A R 0 0 2 1 8 6 5</b> 11 12 <b>0 9 0 8 0 4</b> 17 18 <b>S</b> 19 <b>S</b> 20 <b>1</b>	Remarks																								
<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:10%;">0</td><td style="width:10%;">8</td><td style="width:10%;">-</td><td style="width:10%;">0</td><td style="width:10%;">0</td><td style="width:10%;">0</td><td style="width:10%;">3</td><td style="width:10%;">6</td><td style="width:10%;"></td><td style="width:10%;"></td><td style="width:10%;"></td><td style="width:10%;"></td><td style="width:10%;"></td><td style="width:10%;"></td><td style="width:10%;"></td><td style="width:10%;"></td><td style="width:10%;"></td><td style="width:10%;"></td><td style="width:10%;"></td><td style="width:10%;"></td> </tr> </table>						0	8	-	0	0	0	3	6												
0	8	-	0	0	0	3	6																		
Inspection Work Days		Facility Evaluation Rating		BI		QA		-----Reserved-----																	
67			69	70	<b>4</b>	71	<b>N</b>	72	<b>N</b>	73		74		75					80						

### Section B: Facility Data

Name and Location of Facility Inspected ( <i>For industrial users discharging to POTW, also include POTW name and NPDES permit number</i> ) <b>City of Eureka Springs Waste Water Utility</b> <b>100 Hwy 23 North</b> <b>Eureka Springs, AR 71632</b> <b>Carroll County</b>	Entry Time/Date <b>09:00 August 4, 2009</b>	Permit Effective Date <b>December 1, 2007</b>
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) <b>Mr. Mike Wegrzyn/ Plant Operator/ 479-253-7410</b>	Exit Time/Date <b>17:36 August 4, 2009</b>	Permit Expiration Date <b>November 30, 2012</b>
Name, Address of Responsible Official/Title/Phone and Fax Number <b>Dwayne Allen/ Public Works Director/ 479-253-9600/ Fax 479-253-6974</b> <b>City of Eureka Springs</b> <b>3174 E. Van Buren</b> <b>Eureka Springs, AR 72632</b>	Contacted Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Other Facility Data <b>N 36.4196</b> <b>W 93.7346</b>

### Section C: Areas Evaluated During Inspection

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

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

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

- During this inspection the plant was found to be clean and well maintained. The staff was removing dead or inactive piping during the inspection.
- This was a Compliance Sampling Inspection. Attached to this report are the analytical results for the waste water sample collected during this inspection.
- Discharge Monitoring Reports for May and June 2009 were reviewed. The discharge was well below the permitted limits for all parameters for these months with the exception of phosphorous. The phosphorous discharge limit is routinely exceeded. The plant staff is making steady progress in improving effluent water quality.
- Sludge management equipment is being upgraded, including dewatering and additional composting capability.
- A 3-hour composite sample was collected of plant discharge on 8/4/09. The fecal coliform sample exceeded the permit limit.(See attachment for results)

Name(s) and Signature(s) of Inspector(s) <b>Tony L. Morris</b>	Agency/Office/Telephone/Fax <b>AR Dept. of Environmental Quality- Jasper Field Office</b> <b>870-446-2770/870-446-2181 (Fax)</b>	Date <b>August 24, 2009</b>
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date

**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: The operator is presently developing an SOP for the plant.

- 1. TREATMENT UNITS PROPERLY OPERATED: S M U NA NE
- 2. TREATMENT UNITS PROPERLY MAINTAINED: S M U NA NE
- 3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED: S M U NA NE
- 4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE: S M U NA NE
- 5. ALL NEEDED TREATMENT UNITS IN SERVICE: S M U NA NE
- 6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED: 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: Y N NA NE
- 14. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT: 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:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
6. SAMPLE COLLECTION PROCEDURES ADEQUATE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
a. SAMPLES REFRIGERATED DURING COMPOSITING:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
b. PROPER PRESERVATION TECHNIQUES USED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
c. CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
7. IF MONITORING IS PERFORMED MORE OFTEN THAN REQUIRED ARE RESULTS REPORTED ON THE DMR:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE

**SECTION E: FLOW MEASUREMENT**

PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS

S M U NA NEDETAILS: **Flow devices were within acceptable accuracy, routine checks recorded.**

1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: __ TYPE OF DEVICE: <u>9" Parshall Flume</u>	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED: <u>Sonic Device</u>	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
4. CALIBRATION FREQUENCY ADEQUATE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
5. RECORDS MAINTAINED OF CALIBRATION PROCEDURES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
6. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
7. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
8. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
9. HEAD MEASURED AT PROPER LOCATION:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> 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) :	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED:	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE
3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT:	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE
4. QUALITY CONTROL PROCEDURES ADEQUATE:	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE
5. DUPLICATE SAMPLES ARE ANALYZED $\geq$ 10% OF THE TIME:	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE
6. SPIKED SAMPLES ARE ANALYZED $\geq$ 10% OF THE TIME:	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE
7. COMMERCIAL LABORATORY USED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
a. LAB NAME: <u>ESC</u>	
b. LAB ADDRESS: <u>1107 Century Springdale, AR 72764</u>	
c. PARAMETERS PERFORMED: <u>CBOD, TSS, NH3-N, Fecal Coliform, Nitrate+Nitrite Nitrogen</u>	
8. BIOMONITORING PROCEDURES ADEQUATE:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
a. PROPER ORGANISMS USED:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
b. PROPER DILUTION SERIES FOLLOWED:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
c. PROPER TEST METHODS AND DURATION:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
d. RETESTS AND/OR TRE PERFORMED AS REQUIRED:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE

**SECTION G: EFFLUENT/RECEIVING WATERS OBSERVATIONS**

BASED ON VISUAL OBSERVATIONS ONLY S M U NA NE

DETAILS: The discharge was very slightly turbid and foamy in receiving stream otherwise looked good.

OUTFALL #:	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	COLOR	OTHER
001	none	none	Very slight	Very slight	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): composted

**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:	<b>08/04/09</b>	Time:	<b>11:50</b>
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Head in Inches:	<b>4.41</b>	Feet:	<b>.36</b>
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Type & Size of Primary Flow Measurement Device: **9 Inch Parshall Flume**

Name & Model of Secondary Flow Measurement Device: **Hach Sonic**

Date of last Calibration of Secondary Flow Device:

Recorded Flow at Date & Time Listed Above:	<b>0.41 mgd</b>	(Facility Flow Meter)
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Calculated Flow at Date & Time Listed Above:	<b>0.4156</b>	
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(Flow is calculated using flow charts in: ISCO Open Channel Flow Measurement Handbook-5<sup>th</sup> Edition)

% Error =	Recorded Value	-	Calculated Value	X 100	
	Calculated Value				

% Error =	4.41	-	4.38	X 100	
	4.41				

% Error =	.03			X 100	
	4.41				

% Error =	.0068			X 100	
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% Error =	<b>0.6</b>	%			
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Comments: **The devices are within the acceptable range.**





**Water Division NPDES Photographic Evidence Sheet**

<b>Location:</b>	Eureka Springs POTW
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<b>Photographer:</b>	Tony Morris	<b>Witness:</b>	Mike Wegrzyn
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<b>Photo #</b>	1	<b>Of</b>	4	<b>Date:</b>	08/04/09	<b>Time:</b>	09:30
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<b>Description:</b>	The head works of the treatment plant looking at the bar screen and cominuter.
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<b>Photographer:</b>	Tony Morris	<b>Witness:</b>	Mike Wegrzyn
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<b>Photo #</b>	2	<b>Of</b>	4	<b>Date:</b>	08/04/09	<b>Time:</b>	19:41
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<b>Description:</b>	The SBR's in operation at the plant.
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**Water Division NPDES Photographic Evidence Sheet**

**Location:** Eureka Springs POTW

**Photographer:** Tony Morris      **Witness:** Mike Wegrzyn

**Photo #** 3    **Of** 4      **Date:** 08/04/09    **Time:** 19:41

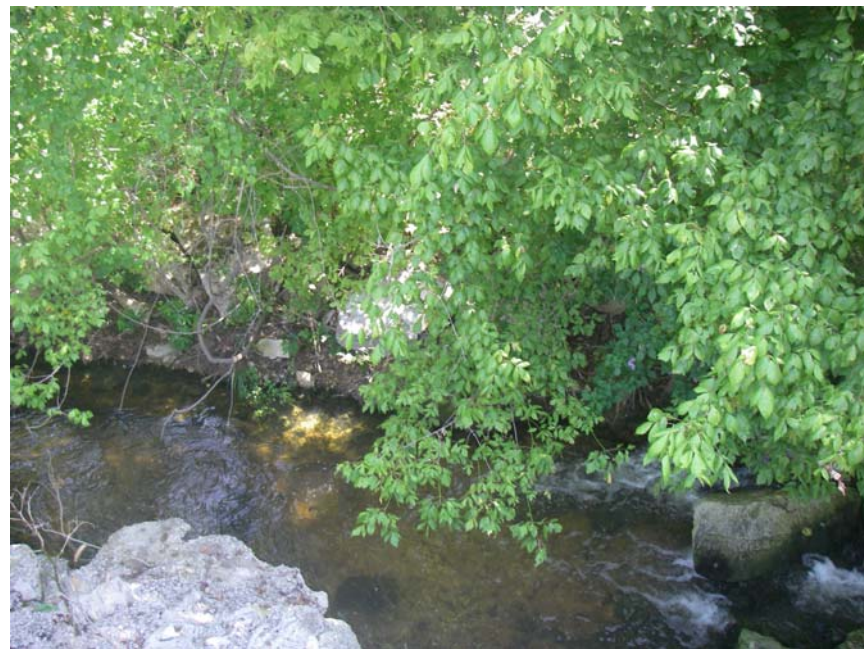
**Description:** U.V. sterilization prior to effluent flow measurement and discharge to Leatherwood Creek.



**Photographer:** Tony Morris      **Witness:** Mike Wegrzyn

**Photo #** 4    **Of** 4      **Date:** 08/04/09    **Time:** 11:02

**Description:** Leatherwood Creek just below the plant outfall at the time of the inspection.



# Arkansas Department of Environmental Quality

5301 Northshore Drive  
North Little Rock, AR 72118

## - CERTIFICATE OF ANALYSIS -

**Our Lab#:** 2009-2013

**Sample ID:** AR21865

**Sample C**  
**Type:**

**Sample Collect Date:** 8/5/2009

**Report Date:** 8/24/2009

<u>Test Group</u>	<u>Test</u>	<u>Result</u>	<u>Units</u>	<u>Analysis Date</u>	<u>MDL</u>	<u>RDL</u>
CBOD5	5-day Carbonaceous BOD	1.73	mg/L	8/5/2009	0.2	0.20
NH3/PO4/NO3	Ammonia as nitrogen	0.069	mg/L	8/5/2009	0.03	0.030
	Orthophosphate as phosphorus	4.11	mg/L	8/5/2009	0.005	0.005
	Nitrite+Nitrate-N	3.06	mg/L	8/5/2009	0.01	0.010
FC-MF	Fecal coliform	1000	cfu/100 ml	8/5/2009	1	1
TSS/TDS	Total suspended solids	2.8	mg/L	8/5/2009	1	1.0



# City of Eureka Springs

Public Works Department  
3174 East Van Buren Street  
Eureka Springs, Arkansas 72632

Office of the Director, Dwayne Allen  
Phone: 479-253-9600  
Fax: 479-253-6974  
E-mail: [dallen@eurekasprings.org](mailto:dallen@eurekasprings.org)

September 22, 2009

Mr. Tracy Blake  
ADEQ Water Division  
5301 Northshore Drive  
North Little Rock, AR 72118-5317

Re: Plant Inspection

Mr. Blake:

Tony Morris District Two Field Inspector performed a routine compliance sample inspection on our facility on August 4, 2009. Mr. Morris noted that the operation of the plant along with its physical structure has showed steady improvements during his visits. Mr. Morris is aware that we have installed a new belt press and have awarded a contract for expansion of our compost facility. That along with the tank modifications we are making will solve our phosphorous removal by allowing chemical addition. We are making great improvements but staying under limits on P, biologically has been a challenge.

Mr. Morris's fecal coliform result of 1000/ 100 ml has me concerned. I had our personal pull extra samples and I am having our lab review their procedures as well as ours. The lamps were cleaned, and although they have not yet reached their expected life span, they are close enough that I have ordered a complete set of replacements. We are reviewing the programming of our uv plc as well as consulting with the manufactory. Our seven day averages are still within limits, but we do not want any samples out of compliance. I am confident any problems will be identified and corrected and that our system will meet our permit limits.

Please call me at 479-253-9600 if you have any questions.

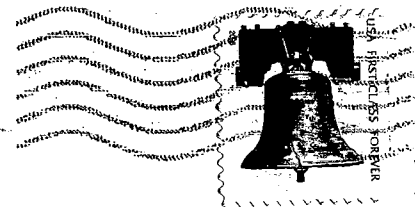
Sincerely,

  
Dwayne Allen,  
Public Works Director



**PUBLIC WORKS**  
**3174 E. Van Buren**  
**Eureka Springs, AR 72632**

NORTHWEST AR P&DF  
AR 727 2 T  
24 SEP 2009 PM



Mr. Tracy Blake  
ADEQ Water Division  
5301 Northshore Drive  
North Little Rock, AR 72118-5317

721185317

