



ARKANSAS
Department of Environmental Quality

January 25, 2010

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 January 14, 2010, I performed a routine compliance 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:

1. All facilities and systems of treatment and control at the plant are not being maintained in violation of Part II, Section B of the Permit. Specifically, the following problems were noted during this inspection:

- The plant headwork's was non functional at the time of this inspection and has been intermittently operational during November and December of 2009 and January of 2010 which has allowed excessive grit and grease to enter the Sequencing Batch Reactors(SBR's).
- A pump in the plant main lift station had frozen and broken;
- The waste sludge line from the SBR's to the aerobic digester was frozen preventing the proper operation of the plant;
- The effluent totalizer chart recorder was not operational during this inspection.
- Spill sludge was noted on the ground in the area of one of the aerobic digesters and the sludge press building.

2. The Part I, Section A, of the Permit, Effluent Limitations and Monitoring Requirements are not being met in violation of the Permit. Specifically, the following problems were noted during this inspection:

- A 3 hour composite sample collected 3 times per month is required for CBOD, TSS, Ammonia -Nitrogen. By definition in the permit, a 3 hour composite may not be initiated before 10:00 am. According to chain of custody forms, the 3 hour composite samples are being started prior to 10:00 am;
- Distinctly visible solids and persistent foam were observed in the receiving stream;
- Sludge banks were observed within the receiving stream for up to ½ mile below the plant outfall.

3. Monitoring of the effluent must be conducted in accordance with procedures approved under 40 CFR Part 136 as required by Part II, Section C.3 of the Permit. The following permit violations were noted:

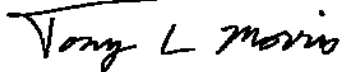
- From chain of custody reports TSS samples are being preserved with sulfuric acid. This sample should only be preserved on ice.
- Fecal coliform and CBOD samples are not being preserved on ice during transport to the lab as required by the approved methods;
- Inadequate calibration records are being kept for pH and DO analysis. In order to assure the reliability of the reported analytical values for pH and DO a record of standards used, calibration temperature, slope and percent efficiency must be recorded and maintained on site.

4. Part III, Section B of the Permit requiring periodic sampling and analysis of the sludge or biosolids generated by the plant and annual reporting to the Department is not being done. An annual report, to be submitted by May 1, for the previous calendar year was not submitted to the Department and a copy maintained on site. A list of the items to be addressed in the report is included in the permit and includes waste characterization, application site soil test analysis, application dates, application volumes, application method, applicator identity, type of cover crop on application site, amount of N applied, total elements added to application site each year, cumulative elements applied to date.

The above items require your immediate attention. Please submit a written response to these findings to the attention of Cindy Garner, Water Division Enforcement Branch Manager of ADEQ. This response should be mailed to the address at bottom of page 1 of this letter. This response should contain detailed documentation describing the course of action taken to correct the items noted. This corrective action should be completed as soon as possible, and the written response is due by February 7, 2010. For additional information you may contact the Enforcement Branch by telephone at 501-682-0639.

If you would like to discuss any aspect of this inspection or if I can be of any assistance, please contact me at 870-446-2770 or by e-mail at morris@adeq.state.ar.us.

Sincerely,



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 N 2 5 3 A R 0 0 2 1 8 6 5 11 12 1 0 0 1 1 4 17 18 C 19 S 20 1	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	1	71	N	72	N	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>) City of Eureka Springs Waste Water Utility 100 Hwy 23 North Eureka Springs, AR 71632 Carroll County	Entry Time/Date 10:00 January 14, 2010	Permit Effective Date December 1, 2007
	Exit Time/Date 16:15 January 14, 2010	Permit Expiration Date November 30, 2012
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Mr. Mike Wegrzyn/ Plant Operator/ 479-253-7410	Other Facility Data N 36.4196 W 93.7346	
Name, Address of Responsible Official/Title/Phone and Fax Number Dwayne Allen/ Public Works Director/ 479-253-9600/ Fax 479-253-6974 City of Eureka Springs 3174 E. Van Buren Eureka Springs, AR 72632	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	M	Flow Measurement	U	Operations & Maintenance	U	Sampling
U	Records/Reports	U	Self-Monitoring Program	U	Sludge Handling/Disposal	N	Pollution Prevention
U	Facility Site Review	N	Compliance Schedules	N	Pretreatment	N	Multimedia
U	Effluent/Receiving Waters	M	Laboratory	N	Storm Water	U	Other: Effluent Limits

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

- This CEI was conducted following a December 31, 2009 Reconnaissance inspection which indicated serious operational problems at the facility.
- Discharge Monitoring Reports for September, October and November 2009 were reviewed during this inspection. With the exception of phosphorous, all parameters were well within the permitted discharge limits. The DMR for December 2009 has not been submitted.
- Numerous problems were noted with the operation and maintenance of the plant and collection system including: headworks not operational during inspection and intermittently during November, December and January, results in excessive grit and grease reaching SBR's, the large gravel and concrete in headworks indicate deteriorating collection lines; Freeze busted pump in main plant lift station; Waste sludge line from SBR frozen, sludge couldn't be wasted resulting in excessive sludge blanket in SBR's; spilled sludge and grit within the plant area.
- Effluent was brown in color, foamy and turbid. Sludge banks were observed in the receiving stream.
- Problems were noted with facility sampling including: TSS sample improperly preserved with H2SO4; FC and CBOD not preserved with ice; no instantaneous flow for grab samples; 3 hr composite sample collected prior to 10:00 am; Inadequate calibration records for pH and DO
- Sludge application records are not being maintained.

Name(s) and Signature(s) of Inspector(s) Tony L. Morris	Agency/Office/Telephone/Fax AR Dept. of Environmental Quality- Jasper Field Office 870-446-2770/870-446-2181 (Fax)	Date January 19, 2010
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:

- 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: <u>3 hr composite started prior to 10:00am</u>	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input 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 type="checkbox"/> Y <input checked="" 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: <u>FC and CBOD not preserved with ice, TSS improperly preserved with H2SO4</u>	<input type="checkbox"/> Y <input checked="" 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: Effluent totalizer chart recorder was not operational

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>Hach Sonic Device</u>	<input type="checkbox"/> Y <input checked="" 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: <u>Calibration records needed for pH, DO</u>	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input 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 checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
6. SPIKED SAMPLES ARE ANALYZED \geq 10% OF THE TIME:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input 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	Some	Very turbid	Moderately	Some	Brown	

SECTION H: SLUDGE DISPOSAL

SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS S M U NA NE

DETAILS:

- | | |
|---|---|
| 1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY: | <input type="checkbox"/> S <input type="checkbox"/> M <input checked="" type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503: | <input type="checkbox"/> S <input type="checkbox"/> M <input checked="" type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 3. FOR LAND APPLIED SLUDGE, TYPE OF LAND APPLIED TO: (E.G., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE): <u>composted and land applied</u> | |

SECTION I: SAMPLING INSPECTION PROCEDURES

SAMPLE RESULTS WITHIN PERMIT REQUIREMENTS S M U NA NE

DETAILS:

- | | |
|--|--|
| 1. SAMPLES OBTAINED THIS INSPECTION: | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE |
| 2. TYPE OF SAMPLE: <input type="checkbox"/> GRAB:__ <input type="checkbox"/> COMPOSITE:__ METHOD:__ FREQUENCY: | |
| 3. SAMPLES PRESERVED: | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE |
| 4. FLOW PROPORTIONED SAMPLES OBTAINED: | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE |
| 5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE: | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE |
| 6. SAMPLE REPRESENTATIVE OF VOLUME AND NATURE OF DISCHARGE: | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE |
| 7. SAMPLE SPLIT WITH PERMITTEE: | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE |
| 8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED: | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE |
| 9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT: | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> 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: | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE |
| 2. SITE MAP INCLUDING ALL DISCHARGES AND SURFACE WATERS: | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE |
| 3. POLLUTION PREVENTION TEAM IDENTIFIED: | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE |
| 4. POLLUTION PREVENTION TEAM PROPERLY TRAINED: | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE |
| 5. LIST OF POTENTIAL POLLUTANT SOURCES: | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE |
| 6. LIST OF POTENTIAL SOURCES AND PAST SPILLS AND LEAKS: | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE |
| 7. ALL NON-STORM WATER DISCHARGES ARE AUTHORIZED: | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE |
| 8. LIST OF STRUCTURAL BMPS: | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE |
| 9. LIST OF NON-STRUCTURAL BMPS: | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE |
| 10. BMPS PROPERLY OPERATED AND MAINTAINED: | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE |
| 11. INSPECTIONS CONDUCTED AS REQUIRED: | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE |

FLOW CALCULATION SHEET

Date: **01/14/10** Time: **12:20**

Head in Inches: **22.5** Feet: **1.87**

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: **5.42 mgd** (Facility Flow Meter)

Calculated Flow at Date & Time Listed Above: **5.19**
 (Flow is calculated using flow charts in: ISCO Open Channel Flow Measurement Handbook-5th Edition)

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

% Error =	5.42	-	5.19	X 100	
	5.19				

% Error =	.23	X 100	
	4.41		

% Error =	.0443	X 100	
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% Error =	4	%	
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Comments: **The devices are within the acceptable range. The chart recorder was not operational.**

Water Division NPDES Photographic Evidence Sheet

Location: Eureka Springs POTW

Photographer: Tony Morris **Witness:** Dale Washam

Photo # 1 **Of** 8 **Date:** 01/14/10 **Time:** 10:18

Description: The non operational head works with coarse grit accumulation.



Photographer: Tony Morris **Witness:** Dale Washam

Photo # 2 **Of** 8 **Date:** 01/14/10 **Time:** 10:25

Description: A pump in the main lift station of the plant which froze and busted during recent freeze.



Water Division NPDES Photographic Evidence Sheet

Location:	Eureka Springs POTW						
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Photographer:	Tony Morris	Witness:	Dale Washam		
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Photo #	3	Of	8	Date:	01/14/10	Time:	10:33
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Description:	Spilled sludge within the plant area.						
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Photographer:	Tony Morris	Witness:	Dale Washam		
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Photo #	4	Of	8	Date:	01/14/10	Time:	10:39
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Description:	Waste sludge line from SBR to sludge aeration tank was frozen preventing wasting of sludge.						
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Water Division NPDES Photographic Evidence Sheet

Location:	Eureka Springs POTW
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Photographer:	Tony Morris	Witness:	Dale Washam
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Photo #	5	Of	8	Date:	01/14/10	Time:	11:00
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Description:	Floating scum consisting of solids and grease in SBR during fill cycle.
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Photographer:	Tony Morris	Witness:	Dale Washam
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Photo #	6	Of	8	Date:	01/14/10	Time:	10:47
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Description:	Tank prior to disinfection & discharge. Contents should be clear, free of floating grease and solids.
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Water Division NPDES Photographic Evidence Sheet							
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Location:	Eureka Springs POTW						
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Photographer:	Tony Morris			Witness:	Dale Washam		
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Photo #	7	Of	8	Date:	01/14/10	Time:	12:27
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Description:	Foamy and turbid plant effluent being discharged to Leatherwood Creek.						
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Photographer:	Tony Morris			Witness:	Dale Washam		
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Photo #	8	Of	8	Date:	01/14/10	Time:	10:04
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Description:	Leatherwood Creek ½ mile below the plant outfall with dark gray sludge banks in eddy.						
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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@cityofeurekasprings.org

February 4, 2010

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

Re: Permit-AR0021865

Mr. Little:

The City of Eureka Springs takes the noted problems found during the last inspection very seriously and is rectifying them as quickly as possible. I have kept Mr. Morris up to date on our situation and will keep you closely involved as well. The plant supervisor was terminated and after allegations of purposely violating the permit, was charged by the local authorities. We have placed ads for a competent operator and will address our staff training needs. I will personally keep close supervision of the plant and have now included our Public Works manager in oversight. I discovered we had problems with basin two's DO probe, which is back on line and the basin is showing marked improvement already. We will address these problems as well as others I have found. Notification of violations shall be a requirement for employment with the City of Eureka Springs.

Part II, Section B: The PLC from the plants headworks was shipped to Lakeside Equipment, who were able to restore the program and we now have no faults or errors with all drives working. I have Serve-A-Tron and Fink Electric working on a final screen relay problem. The lift stations are back on line all frozen pipes have been repaired and the environmental clean-up complete. The effluent totalizer, which should have never been off line was put back on line immediately and was calibrated this week by Instrument and Supply. All components of the plant will be kept on line and when they are down for maintenance your department will be notified. Our O&M manual is being updated and will include a spare parts list.

Part I Section A: All three hour composite samples will never again be taken before 10:00 a.m. I have been working with Mr. Dave Ripple who represents Jet Tech, Siemens and with USI Engineering on our plant set points. I am working closely with Mr. Raglin, with the City of Green Forest who has helped us to remove filamentous bacteria and reseed our basin.

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@cityofeurekasprings.org

Part II Section C.3: I have included a letter from our lab, Environmental Services Inc. stating there was a mistake on their chain of custody report and have not been preserving RTSS samples with acid and have been using ice for transport. The calibration records for PH and DO were inadequate I have replaced the PH probe and have had the City of Berryville help with the calibration and our record keeping. We are setting up a spreadsheet for our daily samples which will show any problems before they get out of hand.

Part III Section B: The sampling and analysis of our biosolids has been reported annually by May 1 for the previous calendar years. The only land application was last year and will be included on that report due by May 1 of this year. These reports will now be kept on sight at the Wastewater Treatment Plant as well as my office. We are reviewing all items that must be included in the upcoming report. With the extra nutrient removal achieved we will not have enough space to compost all of our biosolids to a Class A product and will have to land apply Class B compost in the future. USI Engineering and Aero Mod are advising us on our solids removal.

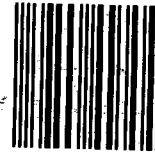
I will continue to give weekly updates to Mr. Morris and continue to personally oversee daily operations until a qualified supervisor is in place. The last two sampling periods for January were back to normal, although we have made great strides we still have low MLSS with some foaming in basin two. Please call me if you have any questions or concerns.

Sincerely,



**Dwayne Allen,
Public Works Director**

The City of Eureka Springs
3174 East Van Buren
Eureka Springs, AR 72632



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



ADEQ

ARKANSAS
Department of Environmental Quality

March 15, 2010

Mr. Dwayne Allen
Eureka Springs, City of
3174 East Van Buren Street
Eureka Springs, AR 72632

RE: AR0021865, AFIN: 08-00036, Response to Inspection

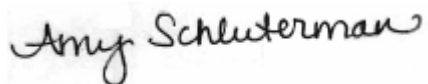
Dear Mr. Allen:

The Department has received your response to the January 14, 2010 inspection of your facility by our District Field Inspector, Tony Morris. Your letter appears to adequately address the discrepancies identified during the visit. The Department assumes the corrective actions taken will be maintained to ensure consistent compliance with the requirements of the permit. Acceptance of this response by the Department does not preclude any future enforcement action deemed necessary at this site or any other site.

The Department will keep the inspection and response on file. If future violations occur that require enforcement action, the Department will consider the inspection and response as required by the Pollution Control and Ecology Commission Regulation No. 7, Civil Penalties. This regulation requires the Department to consider the past history of your facility and how expeditiously the violations were addressed in determining any civil penalty that may be necessary for any future violations.

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 501-682-0633 or you may e-mail me at schluterman@adeq.state.ar.us.

Sincerely,



Amy Schluterman
Enforcement Analyst
Water Division, Enforcement Branch

