

April 13, 2011

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 March 8, 2011, 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. No permit violations are being cited for this inspection.

The operation of the treatment plant has greatly improved and the plant is producing very good quality effluent which reflects well on the city of Eureka Springs. Although great progress has been made at the plant, several housekeeping issues were noted which must be addressed. Specifically, better management of bar screenings, cleanup of construction debris and removal of dead lines remaining from the old treatment plant must be undertaken. The plant should appear to the public passing on Hwy 23 like it is producing high quality water. These comments are not intended to disparage the staff in any way. They have worked hard to get the plant working at full potential and efficiency and their efforts are being documented by Discharge Monitoring Reports in which monitoring parameters are well below the permit limits. I urge you to continue the progress at the plant while maintaining the recently achieved effluent quality.

I appreciate the courtesy extended to me by the Eureka Springs Public Works staff during this inspection. If you have any questions or would like to discuss this inspection in greater detail, I can be contacted at 870-446-2770 or by e-mail at morris@adeq.state.ar.us.

Sincerely,

Vony L Morro

Tony L. Morris District 2 Field Inspector ADEQ Water Division

cc: Water Division Enforcement Branch Water Division Permits Branch

\$	epa	L																							(			prove 2040-0		
							U	INITED	) STATE	ES ENV	IRONM	ENTAI	L PROT	ECTIC	ON AGE	NCY														
					NF	מי	ES	Co	<b>m</b>		shingtor ANC			nec	rtio	<b>n</b> ]	Rei	or	·t											
					111				<b>, , , , , , , , , , , , , , , , , , , </b>	2110			-		onal D		-													
	Tron	sactio	n Cod	0						NPD		Jeeno			/ilui D	uu b	jstem		/Mo/l	Jav			Inc	pec. T	wne	I.	ispect	tor	Fac	. Type
1	N	2	5	3	А	R	0	0	2	1	8	6	5	11	12		1	0	3	0	8	17	18	C C	ype	19	1Ê -	20	1	1
	0	8	-	0	0	0	3	6							Rema	rks							I			1		1		1
	In	specti	on W	ork D	Days			Fac	cility E	Evalua	tion R	ating		<u> </u>	BI		QA							Reserv	ved					
	67				69				70	5	ļ			71	Ν	72	N	73			74	75							80	)
	Section B: Facility Data																													
incli City	Name and Location of Facility Inspected (For industrial users discharging to POTW, also       Entry Time/Date         include POTW name and NPDES permit number)       12:20 March 8, 2011         City of Eureka Springs Waste Water Utility       10:00 march 8, 2011														ffectiv er 1, 2		te													
Eur	100 Hwy 23 North Eureka Springs, AR 71632Exit Time/Date 16:30 March 8, 2011Carroll County16:30 March 8, 2011											Permit Expiration Date November 30, 2012																		
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)Other Facility DataMr. Terry Long/ Plant Operator/ 479-253-7410N 36.4196W 93.7346																														
									one an 53-960				6974											<u>,,,,,</u>	40					
City	of H	Eurek	a Spri		or K5	Direc			55-700	07 <b>I</b> a	177-	200-0								tacted										
			Buren gs, Al	R 726	532													Yes	$\checkmark$	No										
									(S =	= Satis					valua , U = V		0				uated	l)								
S	Per	rmit						S ]	Flow I	Measu	reme	nt		-	S	Op	eratio	ations & Maintenance N			Ν	Sampling								
S	Re	cords	/Repo	rts				S g	Self-M	Ionito	ring I	Progr	am		S	Sh	idge H	landli	ing/D	ispos	al		Ν	Pollu	ution	Prev	entio	n		
S	Fa	cility	Site R	eviev	W		1	N	Comp	liance	Sche	dules			Ν	Pr	etreat	nent					Ν	Mul	timed	lia				
S	Eff	luent	/Rece	iving	Wat	ers	]		Labor	÷					Ν		orm W						S	Othe	er: Ef	ffluen	nt Lin	nits		
								Secti	ion D:	Sum	nary	of Fir	nding	s/Con	nment	s (At	tach a	dditio	onal s	heets	if ne	cessar	y)							
	<ul> <li>During this inspection the plant discharge was observed to be clear and free of grease and solids.</li> <li>Discharge Monitoring Reports for October, November, December 2010 and January 2011 were reviewed. The discharge was well below the permitted limits for these months.</li> <li>The contents of the sequencing batch reactor vessels were observed to be in better condition with less grease on the surface during the settling and fill</li> </ul>																													
									rior to head			on and	l disc	harge	e was	obser	ved to	be fi	ee of	float	ing sl	udge a	and gr	rease.	The	Lake	Side	grit a	nd g	rease
	-	Se	veral	hous	ekeep	oing is	ssues	were	noted demol	durin	g the	plant	insp	ectior	1 whic	h sho	ould be	add	ressec	l incl	uding	: bar	scree	nings s a fror	spille	d ont	o the	grou	nd ne	ear
	-	Α	bypas	s rec	ently	occu	rred d	luring	g a po March	wer fa	ilure	when																	SSO	1
Name(s) and Signature(s) of Inspector(s)       Agency/Office/Telephone/Fax         AR Dept. of Environmental Quality- Jasper Field Office/Telephone/Fax									office		Date		0 201	11																
Ton	y L.	Morr	is	onz	2 L	me	nro								/870-4				- Jasj	JCI I'I	ciù (	mee		March 10, 2011						
Sig	natur	e of F	eview	er								Ag	ency/	Office	e/Phor	ie and	I Fax N	Jumbo	ers					Date						

Permit #: AR0021865

SECTION A: PERMIT VERIFICATION	
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS	🗹 s 🗆 m 🗇 u 🗆 na 🗠 ne
DETAILS:	
1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE:	
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES:	
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT:	
4. ALL DISCHARGES ARE PERMITTED:	
SECTION B: RECORDKEEPING AND REPORTING EVALUATION	
RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT	Øs □m □u □na □ne
DETAILS:	
1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS:	
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE:	🗹 s 🗆 m 🗇 u 🖾 na 🖾 ne
a. DATES AND TIME(S) OF SAMPLING:	
b. EXACT LOCATION(S) OF SAMPLING:	
c. NAME OF INDIVIDUAL PERFORMING SAMPLING:	
d. ANALYTICAL METHODS AND TECHNIQUES:	
e. RESULTS OF CALIBRATIONS:	
f. RESULTS OF ANALYSES:	
g. DATES AND TIMES OF ANALYSES:	
h. NAME OF PERSON(S) PERFORMING ANALYSES:	
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE:	Os Om Ou Ona Øne
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR:	Os Om Ou Ona Øne
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA:	
SECTION C: OPERATIONS AND MAINTENANCE	
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED	
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:	Os Om Ou Ona Øne
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE:	
9. STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED:	
10. PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED:	
11. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR:	
12. IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED:	
13. HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS:	
14. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT:	
15. IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT:	

Permit #: AR0021865

SECTION D: SAMPLING	
PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS	
DETAILS:	
1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT:	
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES:	
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT:	DY DN ØNA DNE
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT:	
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT:	
6. SAMPLE COLLECTION PROCEDURES ADEQUATE:	
a. SAMPLES REFRIGERATED DURING COMPOSITING:	
b. PROPER PRESERVATION TECHNIQUES USED:	
c. CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136:	
7. IF MONITORING IS PERFORMED MORE OFTEN THAN REQUIRED ARE RESULTS REPORTED ON THE DMR:	
SECTION E: FLOW MEASUREMENT	
PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS	ØS □M □U □NA □NE
DETAILS: Flow devices were within acceptable accuracy.	
1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: TYPE OF DEVICE: 9" Parshall Flu	
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED:	
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED: Sonic Devic	
4. CALIBRATION FREQUENCY ADEQUATE:	
5. RECORDS MAINTAINED OF CALIBRATION PROCEDURES:	
6. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE:	
7. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE:	
8. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES:	
9. HEAD MEASURED AT PROPER LOCATION:	
SECTION F: LABORATORY	
PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS	Øs 🗆 m 🗇 u 🗆 na 🗆 ne
DETAILS:	
1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(B) FOR SLUDGES) :	
2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED:	DY DN DNA ØNE
3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT:	
4. QUALITY CONTROL PROCEDURES ADEQUATE:	DY DN DNA ØNE
5. DUPLICATE SAMPLES ARE ANALYZED ≥10% OF THE TIME:	
6. SPIKED SAMPLES ARE ANALYZED <u>&gt;10%</u> OF THE TIME:	
7. COMMERCIAL LABORATORY USED:	Øy 🛛 n 🗆 na 🖾 ne
a. LAB NAME: <u>ESC</u>	
b. LAB ADDRESS: 1107 Century Springdale, AR 72764	
c. PARAMETERS PERFORMED: CBOD. TSS, NH3-N, Fecal Coliform, Nitrate+Nitrite Nitrogen	
8. BIOMONITORING PROCEDURES ADEQUATE:	
a. PROPER ORGANISMS USED:	
b. PROPER DILUTION SERIES FOLLOWED:	
c. PROPER TEST METHODS AND DURATION:	
d. RETESTS AND/OR TRE PERFORMED AS REQUIRED:	

ADEQ Water NPDES Inspection

AFIN: 08-00036

Permit #: AR0021865

SE		G: EFFLUE	NT/RECEIVIN	IG WATERS	OBSERVATIO	ONS				
BA	SED ON	VISUAL OBS	ERVATIONS (	ONLY			Øs □m [			
DE	TAILS:	The discharge	was greatly imp	proved; it was o	clear with no pe	rsistent foam, slu	udge or greas	<u>e.</u>		
OU	ITFALL #:	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	COLOR	OTHER		
	001	none	none	slight	none	none	clear			
				·		·	·	·		
SE	CTION	H: SLUDGE	DISPOSAL							
SL	UDGE D	DISPOSAL ME	ETS PERMIT F	REQUIREMEN	TS		⊠s ⊡m [			
DE	TAILS:									
1.	SLUDGE M	ANAGEMENT ADEQU	ATE TO MAINTAIN EF	FLUENT QUALITY:			🗹 s 🗆			
2.	SLUDGE R	ECORDS MAINTAINED	AS REQUIRED BY 4	0 CFR 503:			🗹 s 🗆			
3.	FOR LAND	APPLIED SLUDGE, TY	PE OF LAND APPLIE	D TO: (E.G., FOREST	, AGRICULTURAL, PUE	BLIC CONTACT SITE): co	omposted, surplus	s landfilled		
SE	<b>CTION</b>	I: SAMPLIN	G INSPECTIO	ON PROCED	URES					
SA	MPLE R	ESULTS WITH	HIN PERMIT R	EQUIREMENT	ſS		□s □m [	]U ∐NA ǾNE		
DE	TAILS:									
1.										
2.	TYPE OF S	AMPLE: GRAB:		METHOD: FREQUE	ENCY:					
3.	SAMPLES F	PRESERVED:						Y 🗆 N 🗆 NA 🗹 NE		
4.	FLOW PRO	PORTIONED SAMPLE	S OBTAINED:					Y 🗆 N 🗆 NA 🗹 NE		
5.	SAMPLE O	BTAINED FROM FACIL	ITY'S SAMPLING DE	/ICE:				Y 🗆 N 🗆 NA 🗹 NE		
6.	SAMPLE RI	EPRESENTATIVE OF	VOLUME AND NATUR	E OF DISCHARGE:				Y 🗆 N 🗆 NA 🗹 NE		
7.	SAMPLE SE	PLIT WITH PERMITTEI	E:					Y 🗆 N 🗆 NA 🗹 NE		
8.	CHAIN-OF-	CUSTODY PROCEDU	RES EMPLOYED:					Y 🗆 N 🗆 NA 🗹 NE		
9.	SAMPLES (	COLLECTED IN ACCO	RDANCE WITH PERM	IT:				Y 🗆 N 🗆 NA 🗹 NE		
SE	CTION	J: STORM W	VATER POLL	<b>UTION PRE</b>	VENTION PL	AN				
ST	ORM W	ATER MANAG	EMENT MEET	S PERMIT RE	QUIREMENTS	5	□s □m [	JU □NA ØNE		
DE	TAILS:									
1.	SWPPP UP	DATED AS NEEDED:	DATE OF LAST UP	DATE:				y ⊡n ⊡na Øne		
2.	SITE MAP I	NCLUDING ALL DISCH	HARGES AND SURFA	CE WATERS:				Y 🗆 N 🗆 NA 🗹 NE		
3.	POLLUTION	N PREVENTION TEAM	IDENTIFIED:					Y 🗆 N 🗆 NA 🗹 NE		
4.	POLLUTION	N PREVENTION TEAM	PROPERLY TRAINED	):				Y 🗆 N 🗆 NA 🗹 NE		
5.	LIST OF PC	TENTIAL POLLUTAN	SOURCES:					Y 🗆 N 🗆 NA 🗹 NE		
6.	LIST OF PC	DTENTIAL SOURCES A	AND PAST SPILLS AN	D LEAKS:				y 🗆n 🗆na 🗹ne		
7.	ALL NON-S	TORM WATER DISCH	ARGES ARE AUTHOR	RIZED:				y 🗆n 🗆na 🗹ne		
8.	LIST OF ST	RUCTURAL BMPS:						Y 🗆 N 🗆 NA 🗹 NE		
9.	LIST OF NO	ON-STRUCTURAL BMF	PS:					Y 🗆 N 🗆 NA 🗹 NE		
10.	BMPS PRO	PERLY OPERATED AI	ND MAINTAINED:					y 🗆n 🗖na 🖉ne		
11.	INSPECTIC	INS CONDUCTED AS	REQUIRED:					y 🗆n 🗖na 🕅ne		
							•			

Permit #: AR0021865

FLOW CALCULATION SHEET											
Date: 03/	/08/11	Time: <b>14</b> :	02								
	00/11	11111E. <b>14</b> .	03								
Head in Inc	hes: <b>19</b>	Feet:	1.58								
Type & Siz	e of Primary Flow	Measurer	nent Devic	e: 9 Inch Par	shall Flume						
				<u> </u>							
Name & Mo	odel of Secondary	/ Flow Mea	asurement	Device:   Had	ch Sonic						
Date of last	t Calibration of Se	condary F	low Device	<u>- Unknown</u>							
Date of last											
Recorded F	Flow at Date & Tir	ne Listed /	Above: 4	.308 mgd	(Facility Flow Meter)						
	Flow at Date & T			3.995 mgd							
(Flow is calcula	ted using flow charts in:	ISCO Open C	hannel Flow M	leasurement Hand	book-5 <sup>th</sup> Edition)						
	Recorded Value	e - Cal	culated Va								
% Error =		ulated Val		X 100							
% Error =	4.308	-	3.995	X 100							
% EII0I =		3.995		X 100							
	1		T								
% Error =	.313	X 100									
	3.995										
% Error =	.078	X 100									
76 EITOI =	.070	X 100									
% Error =	7.8	%									
	1										
Comments	The devices a	re within	the accep	table range.							

ADEQ Water NPDES	Inspection	AFIN	1: <b>08-00036</b>		Pe	ermit #: AR002	1865			
		DN	AR Calculat	tion Che	ck					
<b>Reporting Period:</b>	From _	2010 Year	12 Month	01 Day	То	2010 Year	12 Month	<u>31</u> Day		
		I Cui	101011011	Duy		I cui		Duy		
Parameter Checked	: <u>C</u>	BOD	_							
	т	oading				Concor	stration			
		Mass			Concentration Monthly					
		vg lbs/	/day	Mo. A	vg	mg/l	•			
<b>Reported Value:</b>		4.0			<2		<2			
Calculated Value:		3.9			2		2			
Permit Value:		75.1			10		15			

If calculated value does not equal reported value, explain: <u>Values are equal.</u>

ADEQ Water NPDES	Inspection	AFIN	1: 08-00036		Pe	ermit #: AR002	1865		
		DN	AR Calculat	tion Che	ck				
<b>Reporting Period:</b>	From _	2010	12	01	_ To	2010	12	31	
		Year	Month	Day		Year	Month	Day	
Parameter Checked	:	TSS	_						
	I	Loading Mass		<b>Concentration</b> <b>Monthly</b>					
	Mo. A	vg lbs	/day	Mo. A	vg		7-day Avg mg/l		
<b>Reported Value:</b>		6.1			3.0		5.0		
Calculated Value:	. <u></u>	6.1			3.09		5.0	)	
Permit Value:		112.6			15		22.	5	

If calculated value does not equal reported value, explain: <u>Values are equal.</u>

			Wa	ter Division NPDES I	Photographic Ev	idence Sheet		
Location:	Εı	ireka Sj	prings PO	DTW				
Photographe			Morris		Witness:	Terry Long		
Photo #	1	Of	6		Date:	03/08/11	Time:	12:48
Description:		The re	ceiving	stream, Leatherwood C	Creek, below the j	plant discharge	e with no slu	dge banks.
Photographe			Morris	1	Witness:	Terry Long	1 1	
Photo #	2	Of	6		Date:	03/08/11	Time:	13:45
Description:				s in fill sequence and s				

		Water Division	n NPDES Photo	graphic Ev	vidence Sheet		
		ngs POTW					
Photographer:	Tony Mo			Witness:	Terry Long		
<b>Photo #</b> 3		6		Date:	03/08/11	Time:	13:20
Description:	Oxidatio	n tank prior to ste	erilization with n	o floating s	cum or grease	evident.	
Photographer:	Tony Mo	orris		Witness:	Terry Long		
Photo # 4	Of	6		Date:	03/08/11	Time:	13:37
Description:	The UV	light banks prior	to discharge.			•	

ADEQ Water NPDES Inspection
-----------------------------

Water Division NPDES Photographic Evidence Sheet									
Location: Eureka Springs POTW									
Photograph	ner:	Tony N	Morris		Witness:	Terry Long			
Photo #	5	Of	6		Date:	03/08/11	Time:	13:11	
Description	<b>i:</b>	House	keeping p	oroblem of spilled bar scre	enings at the	e plant head wo	orks.		
Photographer:         Tony Morris         Witness:         Terry Long									
Photo #	6	Of	6		Date:	03/08/11	Time:	13:14	
Description	i:	House	keeping p	roblem of construction de	bris and tras	h near the plar	nt lift station	l.	