

# ADEQ

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

December 30, 2011

Tom Myers, Wastewater Pollution Control Facility Manager  
City of Siloam Springs  
P.O. Box 80  
Siloam Springs, AR 72761

RE: City of Siloam Springs PCI

AFIN: 04-00106      NPDES Permit Tracking No.: AR0020273

Dear Mr. Myers:

On December 19, 2011, I performed a routine pretreatment 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 there under. This inspection revealed the following:

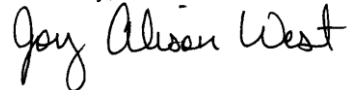
The flow meter at Gates Rubber Company has not been in operation since December 6, 2011. According to Ms. Sorum, Health, Safety, Environmental Coordinator, the part has been ordered for the meter and flow is measured manually at the Parshall flume. At the time of the inspection, you were not aware the flow meter was not in operation. I was informed that you would check with other personnel to determine if Gates Rubber Company contacted the City regarding this issue. Please submit a response to the Department indicating if the City was contacted as required by the industry's control document and if enforcement was necessary.

The above item requires your immediate attention. Please submit a written response to this finding to "Water Division Enforcement Branch". The response should be mailed to the address below, or e-mailed to [Water-Enforcement-Report@adeq.state.ar.us](mailto:Water-Enforcement-Report@adeq.state.ar.us). This response should contain documentation describing the course of action taken to correct each item noted. You must include color photographs that document your corrective actions. This corrective action should be completed as soon as possible, and the written response with all necessary documentation is due by **January 11, 2012**.

For additional information you may contact the enforcement branch by telephone at 501-682-0639 or by fax at 501-682-0910.

If I can be of any assistance, please contact me at 479-267-0811, ext. 12 ([west@adeq.state.ar.us](mailto:west@adeq.state.ar.us)).

Sincerely,



Alison West  
District 1 Field Inspector  
Water Division

cc:      Water Division Enforcement Branch  
          Water Division Permits Branch



Form Approved  
OMB No. 2040-0003

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

# NPDES Compliance Inspection Report

## 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 0 2 7 3</b>	11 12 <b>1 1 1 2 1 9</b>	17 18 <b>P</b>	19 <b>S</b> 20 <b>1</b>		

Remarks: **A F I N 0 4 - 0 0 1 0 6**

Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved
67 <b>69</b>	70 <b>N</b>	71 <b>N</b>	72 <b>N</b> 73	74 75

## 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>Siloam Springs Pollution Control Plant</b> <b>975 Anderson Avenue</b> <b>Siloam Springs, AR 72761</b>	Entry Time/Date <b>9:00 a.m./12-19-2011</b>	Permit Effective Date <b>October 1, 2007</b>
	Exit Time/Date <b>3:35 p.m./12-19-2011</b>	Permit Expiration Date <b>September 30, 2012</b>

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) <b>Tom Myers/ Wastewater Pollution Control Facility Manager /479-524-5623/479-524-4653</b>	Other Facility Data <b>PDS#063052</b>
Name, Address of Responsible Official/Title/Phone and Fax Num <b>Tom Myers/ Wastewater Pollution Control Facility Manager</b> <b>City of Siloam Springs</b> <b>P.O. Box 80</b> <b>Siloam Springs, AR 72761</b> <b>479-524-5623/479-524-4653</b>	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)

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

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

The flow meter at Gates Rubber Company has not been in operation since December 6, 2011. According to Ms. Sorum, HSE Coordinator, the part has been ordered for the meter and flow is measured manually at the Parshall flume. At the time of the inspection, Mr. Myers was not aware the flow meter was not in operation. Mr. Myers stated that he would check with other personnel to determine if Gates Rubber Company contacted the City regarding this issue.

Name(s) and Signature(s) of Inspector(s) <i>Jay Alison West</i>	Agency/Office/Telephone/Fax <b>AR Dept. of Environmental Quality-Fayetteville</b> <b>479-267-0811, ext. 12/479-267-0819</b>	Date <b>December 19, 2011</b>
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY  
PRETREATMENT COMPLIANCE INSPECTION (PCI) REPORT

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Name of Municipality: City of Siloam Springs

AFIN Number: 04-00106

NPDES Permit Number(s): AR0020273, AR0020273C, ARR000276

Program Tracked under NPDES Permit Number: AR0020273

Fact Sheet Preparation Date: N/A

Date of Last PCI/Audit: April 23, 2009/June 7-10, 2010

Date of Last Annual Report: August 25, 2011

Name of Inspector: Alison West

Date PCI Performed: December 19, 2011

Name, Title, and Telephone Number of Facility Representative:  
Tom Myers, Waste Water Superintendent, 479-524-5623

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Name and Title of Other Participants: NA

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Number of IUs Visited: 1

Name(s) of IUs Visited: Gates Rubber Company

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

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**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



B. LOCAL LIMITS

1. IS THE POTW APPLYING LOCAL LIMITS WHICH HAVE BEEN APPROVED BY ADEQ OR EPA? Yes

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2. Describe any apparent problems with the local limits.  
There are no apparent problems with the local limits.

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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		Comments:
		Permit:	Program:	
Metals:				
Influent:	<u>Quarterly</u>	<u>Quarterly</u>	<u>Not req.</u>	<u>None</u>
Effluent:	<u>Quarterly</u>	<u>Quarterly</u>	<u>Not req.</u>	<u>None</u>
Sludge:	<u>2 times/yr</u>	<u>2 times/year</u>	<u>Not req.</u>	<u>None</u>
Organics:				
Influent:	<u>Once/yr</u>	<u>Once/yr</u>	<u>Not req.</u>	<u>None</u>
Effluent:	<u>Once/yr</u>	<u>Once/yr</u>	<u>Not req.</u>	<u>None</u>
Sludge:	<u>Twice/yr</u>	<u>Twice/yr</u>	<u>Not req.</u>	<u>None</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?

**No**

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C. INDUSTRIAL USER CONTROL MECHANISM

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

2. How many IU permits (or other control documents) have been issued? 3

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

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

Type of sample: Yes

Monitoring frequency: Yes

Bypass prohibition: Yes

Right of entry: Yes

Nontransferability: Yes

Revocation clause: Yes

Penalty Provisions: Yes

Slug load notification: Yes

Notification of process change: Yes

D. MONITORING OF IUS BY POTW

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

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

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

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: Reviewed Cobb Vantress

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: NA

Review of self-monitoring records: Yes

Observation of IU self-monitoring procedures: NA

Verification that approved analytical techniques are used: Yes

Verification of IU flow measurement (where required): Yes

6. Overall adequacy of inspection documentation: Satisfactory

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**

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8. Are analyses performed in accordance with EPA-approved methods (40 CFR 136)? **Yes**

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9. Are sampling and flow monitoring equipment properly maintained? **Contract lab samples industries.**

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10. Is the POTW keeping proper field notes and chain of custody forms? **Yes**

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11. Is the sampling location representative of the discharge to the collection system? **Yes**

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12. Are sampling locations identified in POTW records? **Yes**

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13. Are sampling services available in an emergency? **Yes**

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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? **Reports are reviewed by the pretreatment compliance officer.**

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15. ARE SELF-MONITORING REPORTS REVIEWED TO VERIFY THAT ANALYSES WERE PERFORMED FOR ALL REGULATED PARAMETERS, AND TO EVALUATE COMPLIANCE WITH EFFLUENT LIMITS? **Yes**

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16. IF VIOLATIONS ARE FOUND IN REPORTS, DOES THE POTW RESPOND TO ALL VIOLATIONS? **Yes**

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17. What are the POTW's procedures for following up violations?  
**The city responds as specified in its Enforcement Response Plan.**

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18. **HAS THE POTW REVIEWED BMRS FOR COMPLIANCE WITH 40 CFR 403.12(b)?** N/A, There are no new categorical industries since the last inspection.

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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

19. Additional comments on the POTW's inspection and sampling procedures: **The POTW's inspection and sampling procedures appear satisfactory.**

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5. Comments on the POTW's enforcement procedures:  
**Enforcement response procedures appear to be adequate.**

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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**

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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: **None**

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H. EVALUATION AND COMMENTS

The flow meter at Gates Rubber Company has not been in operation since December 6, 2011. According to Ms. Sorum, Health, Safety, Environmental Coordinator, the part has been ordered for the meter and flow is measured manually at the Parshall flume. At the time of the inspection, Mr. Myers was not aware the flow meter was not in operation. Mr. Myers stated that he would check with other personnel to determine if Gates Rubber Company contacted the City regarding this issue. Please submit a response to the Department indicating if the City was contacted as required by the industry's control document and if enforcement was necessary.

The City of Siloam Springs has included a Fats/Oil and Grease Ordinance.

Simmons Foods no longer operates the kill plant.

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Gates Rubber Company

POTW Name: City of Siloam Springs

Industry Contacts: Contessa Sorum, Health, Safety, Environmental Coordinator

Date and Time of Visit: 12-19-2011 p.m./2:00-2:34 p.m.

Description of Manufacturing Process:  
Manufactures rubber belts for automotive and industrial use.

Sources of Process Wastewater:  
Contact and non-contact cooling water, steam condensate, and wastewater from the vulcanization process.

Categorical Industry? Yes

Basis for Limits: Categorical standards and local ordinance

Point of Application: End of discharge pipe

Description of Pretreatment Equipment and Procedures:  
API Oil Separator and belt oil skimmer.

Spill Prevention and Solvent Management Procedures:  
An integrated contingency plan and an SPCC plan.

Sampling Location and Equipment:  
Manhole next to the flow monitoring building near the SE corner of the Gates Rubber building. Environmental Services Lab collects the sample by use of a portable sampler. Facility has a 4210 Ultrasonic flow meter.

## PPETS CODE SHEET

## PRETREATMENT COMPLIANCE INSPECTION (PCI)

		CODE
INSPECTOR'S NAME:	<u>Alison West</u>	
NAME OF FACILITY:	<u>City of Siloam Springs</u>	
PERMIT NUMBER USED TO TRACK PROGRAM:	<u>AR0020273</u>	NPID
DATE OF PCI:	<u>December 19, 2011</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



January 10, 2011

Water Division Enforcement Branch  
Arkansas Department of Environmental Quality  
5301 North Shore Drive  
North Little Rock, AR 72118-5317

RE: AFIN: 04-00106 NPDES Permit No. AR0020273  
Routine Compliance Evaluation Inspection Letter Dated December 30, 2011  
Received January 3, 2012

Mr. Bailey,

Please allow this letter to serve as response from the City of Siloam Springs regarding the inspection by Ms. Alison West performed on December 19, 2011.

During the inspection it was discovered that the flow meter at Gates Rubber Company was not functioning as designed. At the time of the inspection I had no knowledge that there was a malfunction with the meter. Upon investigation it was determined that Ms. Sorum, Health, Safety and Environmental Coordinator at Gates, had staff contact the Siloam Springs Electric Department to report the malfunction associated to electrical problems.

Attached please find the following documentation verifying the results of our investigation:

- Exhibit A: phone contact log from Tom Myers to Electrical Department Superintendent John Bland
- Exhibit B: phone contact log from Contessa Sorum, Gates Rubber Company to City of Siloam Springs
- Exhibit C: phone contact log from Tom Myers to Contessa Sorum, Gates Rubber Company
- Exhibit D: response email by Gates Rubber Company
- Exhibit E: violation letter to Gates Rubber Company

The City of Siloam Springs informed Gates Rubber Company that their information was submitted improperly, and required them to make necessary corrections.

If you have questions regarding this matter feel free to contact this office.

Sincerely,

Thomas A. Myers  
Water Pollution Control Facility Superintendent  
City of Siloam Springs  
Ph: 479-524-5623  
Cell: 479-228-0934



CITY OF  
**Siloam Springs**  
*It's a natural*

## PHONE CONTACT LOG

Name of Caller: Tom Myers	Company: City of Siloam Springs
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Date/Time Call Made/Received: 12-19-11	p.m. 4:40
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Call Received By: John Bland	Company: City of Siloam Springs
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Comments: Tom called John Bland to see if Gates Rubber did contact the City of Siloam Springs Electric Department regarding a problem associated to the flow meter. John said yes they did and it was an electrical problem. John said he did not think to call me regarding this matter and will inform his staff any wastewater related problems they must call Wastewater Plant to report. John Bland said that Gates Rubber did have a neutral problem on the City of Siloam Springs Electric Department side of power line to flow monitoring building. John said they fixed the problem and would pay for the damages that were caused to flow meter.  
John apologized for any problem this may have caused.  
Tom thanked John.

RE: Gates Rubber Discharge Permit
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CITY OF  
**Siloam Springs**  
*It's a natural.*

## PHONE CONTACT LOG

Name of Caller: Contessa Sorum

Company: Gates Rubber Company

Date/Time Call Made/Received: 12-23-11

p.m. 3:05

Call Received By: Water Pollution Control Facility Company: City of Siloam Springs

Comments: Contessa called to notify the City of Siloam Springs that the flow meter replacement was installed and properly operating.

RE: Gates Rubber Discharge Permit



CITY OF  
**Siloam Springs**  
*It's a natural.*

## PHONE CONTACT LOG

Name of Caller: Tom Myers	Company: City of Siloam Springs
Date/Time Call Made/Received: 1-5-12	a.m. 9:22
Call Received By: Contessa Sorum	Company: Gates Rubber Company
Comments: Tom called Contessa Sorum to ask that she submit an overview of the activities associated to the failure of the flow meter device. Contessa said yes she would submit the necessary information.  Tom thanked Contessa.	
RE: Gates Rubber Discharge Permit	

Exhibit "D"

**Tom Myers - Flow meter at Gate Corp.**

**From:** "Sorum, Contessa" <CS0154@gates.com>  
**To:** "Tom Myers <tmyers@siloamsprings.com> (tmyers@siloamsprings.com)" <tmyers@siloamsprings.com>  
**Date:** 1/6/2012 5:07 PM  
**Subject:** Flow meter at Gate Corp.

On 12/06/2011 it was discovered that the flow meter was not functioning. Our maintenance team and electrician were trouble shooting and trying to repair the issue. On 12/08/2011 a new power pack for the flow meter was requested. This requisition was approved and the purchase order was sent to supplier on 12/12/2011. The facility maintenance manager called the supplier the next week after the power pack had not been received timely. The supplier stated that they did not have the PO. We sent the PO again on 12/19/2011. The power pack was received and installed. It did not fix the flow meter. A new flow meter was requested and ordered on 12/21/2011. We received the flow meter on 12/23/2011. It was installed on 12/23/2011 and is operational at this time.

On 12/09/2011 our electrician stated that there was an issue with the City of Siloam Spring's feed line into the flow meter building. John Bland with the City of Siloam was contacted on 12/09/2011. A city employee immediately came to evaluate the problem. There was not a problem detected by the city employees. The following week (12/12/2011) the city employees returned and put a load on the line. The problem was discovered in the feed line into the building. It could not immediately be corrected/fixd by the city employees. A temporary power supply was run to the building. The line was repaired by the city the week of 12/12/2011.

If you have any questions or need additional information, please let me know. Thank you.

**CONTESSA SORUM**  
HSE Coordinator



**GATES CORPORATION**  
1801 N Lincoln  
Siloam Springs, AR 72761  
**Telephone** 479.524.1236  
[csorum@gates.com](mailto:csorum@gates.com)  
Gates.com

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January 9, 2012

Ms. Contessa Sorum  
HSE Coordinator  
Gates Corporation  
1801 N. Lincoln  
Siloam Springs, AR 72761

RE: Industrial Pretreatment Program notice of discharge permit violation.

Ms. Sorum:

This letter is to inform you of one (1) violation of your industrial discharge permit to the Siloam Springs sanitary sewer for December 2011.

The following parameter of your discharge permit was violated:

**Parameter: Flow Monitoring Meter Failure**

Thank you for your timely notification of the violation to the Electric Department as well as the response call and letter regarding the installation and placing of the new unit into operation. **Going forward, please contact the Water Pollution Control Plant directly at 524-5623 upon any violation or problem associated to your Pretreatment Discharge Permit.**

If you have any questions please contact me at 524-5623.

Sincerely,

A handwritten signature in black ink, appearing to read 'Thomas A. Myers'.

Thomas A. Myers  
Water Pollution Control Superintendent  
Cell: 479-228-0934  
[tmyers@siloamsprings.com](mailto:tmyers@siloamsprings.com)

Cc: Peggy Woody, City Clerk

# ADEQ

ARKANSAS  
Department of Environmental Quality

January 26, 2012

Thomas Meyers  
City of Siloam Springs  
P.O. Box 80  
Siloam Springs, AR 72761

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

Dear Mr. Meyers:

The Department has reviewed the response pertaining to the December 19, 2011 pretreatment inspection of the City of Siloam Spring's wastewater treatment facility by District Field Inspector Alison West. The information provided sufficiently addresses the violations referenced in the inspection report. At this time the Department has no further comment concerning this particular inspection.

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 501-682-0635 or you may e-mail me at [anderson@adeq.state.ar.us](mailto:anderson@adeq.state.ar.us).

Sincerely,



Alan Anderson  
Enforcement Analyst  
Water Division Enforcement Branch