

May 16, 2012

David Cameron, City Administrator City of Siloam Springs P.O. Box 80 Siloam Springs, Arkansas 72761

RE: Compliance Evaluation Inspection

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

Dear Mr. Cameron:

On March 21, 2012, accompanied by James Eng, EPA Region 6, I performed a routine compliance evaluation inspection of the wastewater 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. Your permit states that 24-hour flow-proportioned composite samples must be collected for several effluent parameters. However, Jack Harriston, Operator, stated that the Isco automatic effluent sampler was disconnected from the Isco effluent flow meter during POTW expansion construction, and that it is not connected to the ABB transmitter flow meter currently in use. Mr. Harriston stated that the sampler is programmed to collect effluent portions every hour, not proportional to flow, indicating that the plant has been collecting 24-hour time-weighted composite samples. This is in violation of Part 1.A, Part II.B.1.a and Part II.C.1 of your permit. Refer to Part IV (20) of your permit for the definition of 24-hour composite sample.
- 2. Because 24-hour time-weighted composite samples have been taken for effluent parameters requiring 24-hour flow-proportioned composite samples, it has not been possible for you to report accurate mass-loading rates for these parameters on your monthly discharge monitoring reports (DMRs). This is in violation of Part 1.A and Part II.C.1 of your permit.
- 3. The following are violations of Part II.C.3 of your permit:
 - a. According to Mr. Harriston, bagged ice must be used to supplement cooling of samples to 6 degrees C in your influent and effluent refrigerators. These refrigerators are not functioning as designed and must be replaced.
 - b. Mr. Harriston stated that fecal coliform bacteria (FCB) samples are being collected with an unsterilized scoop. FCB sampling equipment must be sterilized prior to each sampling event.

- c. All sample refrigerator thermometers have not been calibrated against a certified thermometer since 2009.
- d. Your records indicate that your lab is using EPA Method 360.1 for dissolved oxygen analysis and EPA Method 330.5 for total residual chlorine analysis. These procedures are not currently approved by 40 CFR Part 136.
- 4. Your standard operating procedures (SOP) must be updated. For example, the SOP for measuring dissolved oxygen does not reference a test procedure approved by 40 CFR 136, but rather references a method internally designated as WW006. This is in violation of Part II.B.1.a of your permit.
- 5. Only one of the two generators used for standby power was in service at the time of the inspection. According to Mr. Harriston, the north generator was taken out of service during construction related to the POTW expansion. The south generator does not provide backup power to all of the plant's treatment units. This is in violation of Part II.B.7 of your permit.
- 6. Excessive grease and algae buildup on the weirs of the primary clarifier and excessive algae buildup on the weirs of the two final clarifiers was causing short circuiting of flow in each of these clarifiers. This is in violation of Part II.B.1.a of your permit. These conditions could cause overflow of settling solids into the launders during high flow periods. Cleaning of the weirs should take place as necessary to allow for equal and unobstructed flow through each of the weirs.
- 7. Part II.C.2 of your permit states that flow measurement devices must be capable of measuring flows with a maximum deviation of less than +/- 10% from true discharge rates throughout the range of expected discharge volumes and shall be installed at the monitoring point of the discharge. The meter at the primary flow measurement device was not in service (see Item 1 above). According to Mr. Harriston, an alternate flow meter (ABB transmitter flow meter) has been used to measure flow. This meter measures flow through a pipe from the final clarifiers to the primary flow measurement device. At the time of the inspection, the discharge rates between the primary flow device and the ABB transmitter deviated by 17%. In addition, flow through the rectangular weir was turbulent, causing significant fluctuations in the water level as it flowed past the gauge used to measure head in this device.
- 8. Part IV (18) of your permit states that the 7-day average discharge limitation is the highest allowable arithmetic mean (geometric mean for FCB) of the values for all effluent samples collected during the calendar week. It states that the DMR should report the highest 7-day average obtained during the calendar month, and that for reporting purposes, the 7-day average values should be reported as occurring in the month in which the Saturday of the calendar week falls in. Total suspended solids (TSS) and total phosphorus (TP) concentrations in the effluent samples taken on Wednesday, November 30, 2011 were 5.0 mg/L and 1.18 mg/L, respectively. These are the 7-day average values you reported for these parameters on your November 2011 DMR. Review of your records indicates that 7-

David Cameron, City of Siloam Springs May 16, 2012 Page 3

day average values of 3.0 mg/L TSS and 0.46 mg/L TP should have been reported on your November 2011 DMR.

The above items require your immediate attention. Please submit a written response to these findings to the "Water Division Enforcement Branch". The response should be mailed to the address provided on the letterhead, or e-mailed to water.org/water.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 action, where applicable. This corrective action should be completed as soon as possible, and the response with all necessary documentation is due by May 29, 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. 16.

Sincerely,

John Fazio

District 1 Inspector

Water Division

cc: Water Division Enforcement Branch

Water Division Permits Branch

ADEQ Water NPDES Inspection	AFIN: 04-00106	Permit #: AR0020273

&	EPA														Form Approved OMB No. 2040-0003		
	NPDE			V	Vashingto	MENTAL I on, D.C. 20 Ce Ir	0460				R	Report					
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									spec. Type Inspector Fac. Type C 19 T 20 1								
	Inspection Work Days		Facilit	y Evalı	ation I	Rating			Remai BI		Q/	A		<u> </u>	Reserved		
	67 69		7	70 1				71	N	72	L	N 73	74 75		80		
							Sect	ion 1	B: Fa	cility	y D)ata			_		
incli City	ne and Location of Facility Inspected and POTW name and NPDES permit of Siloam Springs Pollution Conf	t num	ber)	trial us	ers dis	chargin	g to P	OTV	V, also	o		Entry Time/Date 0940 / 03-21-12			Permit Effective Date October 1, 2007		
	Anderson Ave. am Springs, Arkansas 72761											Exit Time/Date 1535 / 03-21-12			Permit Expiration Date September 30, 2012		
	ne(s) of On-Site Representative(s)/T A Harriston / Operator / 479-524-					mber(s)									her Facility Data utfall 001: 36.19396, -94.56398		
Dav City	ne, Address of Responsible Official/ id Cameron / Public Works Direct of Siloam Springs						13					Contacted	_	PI	9S #065668		
	. Box 80 am Springs, Arkansas 72761											Yes No V	1				
			(S = Sat								ring Inspection factory, N = Not Evalu	ated)				
S	Permit	U	ı	w Mea				-	M	T		rations & Maintenand		U	Sampling		
M	Records/Reports	U	Self	-Moni	toring	Prograi	m		S	Slu	udş	ıdge Handling/Disposal N			Pollution Prevention		
S	Facility Site Review	N	Cor	nplian	ce Sch	edules			N	Pr	retr	reatment		N	Multimedia		
S	Effluent/Receiving Waters	M	Lal	orator	y				N	Sto	tori	m Water			Other:		
		Se	ction	D: Sur	nmary	of Find	lings/	Con	ıment	ts (At	tta	ich additional sheets i	f necessa	ry)			
Jai	James Eng, EPA Region 6, and Jack Harriston, WWTP Operator, were present during my compliance evaluation inspection of the wastewater treatment facility.																
	Discharge Monitoring Reports (DMRs) and DMR calculating spreadsheets were reviewed for the months of November 2011 – January 2012. There were no permit effluent limit excursions during these months.																
See	See Page 11 of this report for a summary of findings.																
Name(s) and Signature(s) of Inspector(s) Agency/Office/Telephone/Fax							Date										
AR Dept. of Environmental Quality-Fayetteville 479-267-0811, ext. 16; 479-267-0819 (fax)					•		May 10, 2012										
Joh	n Fazio																
Sign	nature of Reviewer					Agei	ncy/O	ffice	e/Phon	ne and	d F	Fax Numbers			Date		

ADEQ Water NPDES Inspection	AFIN: 04-00106	Permit #: AR0020273

SECTION A: PERMIT VERIFICATION						
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS	⊠s		ו 🗆		NA	
DETAILS:						
1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE:						□NE
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES:			□Y	□N	ØNA	□NE
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT:			ØΥ	□N	□NA	□NE
4. ALL DISCHARGES ARE PERMITTED:			ØY	□N	□NA	□NE
SECTION B: RECORDKEEPING AND REPORTING EVALUATION						
RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT	□s	✓M		J \square	NA	
DETAILS: 1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS: Not reporting 7-day averages in the manner as defined Part IV of the permit.	ined in					□NE
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE:		Øs				□NE
a. DATES AND TIME(S) OF SAMPLING:			ØΥ	□N	□NA	□NE
b. EXACT LOCATION(S) OF SAMPLING:			ØΥ	□N	□NA	□NE
c. NAME OF INDIVIDUAL PERFORMING SAMPLING:			ØΥ	□N	□NA	□NE
d. ANALYTICAL METHODS AND TECHNIQUES:			ØY	□N	□na	□NE
e. RESULTS OF CALIBRATIONS:			ØY	□N	□NA	□NE
f. RESULTS OF ANALYSES:			ØY	□N	□NA	□NE
g. DATES AND TIMES OF ANALYSES:			ØΥ	□N	□NA	□NE
h. NAME OF PERSON(S) PERFORMING ANALYSES:			ØΥ	□N	□NA	□NE
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE:		⊠s	□м	□u	□na	□NE
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR:		Øs	□м	□u	□NA	□NE
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA:			ØY	□N	□NA	□NE
SECTION C: OPERATIONS AND MAINTENANCE						
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED	□s	⊠M	ו 🗆		NA	□NE
DETAILS:						
1. TREATMENT UNITS PROPERLY OPERATED:		Øs	□м	□u	□NA	□NE
2. TREATMENT UNITS PROPERLY MAINTAINED: Short circuiting occurring at all in-service clarifiers due to excessive grease and/or algae buildup on weirs.		□s	⊠w	□u	□na	□NE
STANDBY POWER OR OTHER EQUIVALENT PROVIDED: North generator not in service and is needed for some of the treatment units (i.e., the south generator (in service) does not provide standby power to the entire plant).		□s	□м	Øυ	□na	□NE
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE:		⊠s	□м	□u	□NA	□NE
5. ALL NEEDED TREATMENT UNITS IN SERVICE: <u>Note</u> : <u>Grit chamber</u> , one of two primary clarifiers & primary sludge thickener not in service.		⊠s	□м	□u	□NA	□NE
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED:		Øs	□м	□u	□NA	□NE
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED: Not required; not a 92-500 facility		□s	□м	□u	ØNA	□NE
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE:			ØΥ	□N	□NA	□NE
9. STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED: Needs to be updated			Øγ	□N	□NA	□NE
10. PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED:			□Y	□м	□na	ØNE
11. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR:			ØY	□и	□па	□NE
12. IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED:			Øγ	□и	□па	□NE
13. HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS:			ØΥ	□N	□NA	□NE
14. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT:			□Y	ØN	□NA	□NE
15. IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT:			□Y	□и	ØNA	□NE

ADEQ Water NPDES Inspection	AFIN: 04-00106	Permit #: AR0020273

SECTION D: SAMPLING		
PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS	□s	□M ☑U □NA □NE
DETAILS:		
SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT:		☑Y □N □NA □NE
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES:		☑Y □N □NA □NE
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT: Time-weighted: auto-sampler not hooked up flow meter.	p to a	□Y ☑N □NA □NE
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT:		☑Y □N □NA □NE
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT:		☑Y □N □NA □NE
6. SAMPLE COLLECTION PROCEDURES ADEQUATE: FCB samples are collected with an unsterilized scoop.		□Y ØN □NA □NE
a. SAMPLES REFRIGERATED DURING COMPOSITING: However; condition of refrigerators requires supplementing cooling v	w/ ice.	☑Y □N □NA □NE
b. PROPER PRESERVATION TECHNIQUES USED:		☑Y □N □NA □NE
c. CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136:		☑Y □N □NA □NE
7. IF MONITORING IS PERFORMED MORE OFTEN THAN REQUIRED ARE RESULTS REPORTED ON THE DMR:		☑y □n □na □ne
SECTION E: FLOW MEASUREMENT		
PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS	□s	□M ☑U □NA □NE
DETAILS:		
PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: TYPE OF DEVICE: 5 foot rectange without end contractions.	ular weir	☑Y □N □NA □NE
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED:		☑Y □N □NA □NE
 SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED: Isco meter no use. At the time of the inspection, the alternate meter (ABB Transmitter Flowmeter) was not capable of measuring flow a maximum deviation of less than +/- 10% from the true discharge rate. The deviation was 17%. 		□y Øn □na □ne
4. CALIBRATION FREQUENCY ADEQUATE:		☑Y □N □NA □NE
5. RECORDS MAINTAINED OF CALIBRATION PROCEDURES:		☑Y □N □NA □NE
6. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE:		☑Y □N □NA □NE
7. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE: Turbulent flow.		□Y ØN □NA □NE
8. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES:		Øy □n □na □ne
9. HEAD MEASURED AT PROPER LOCATION:		□y □n □na Øne
SECTION F: LABORATORY		
PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS	□s	ØM □U □NA □NE
DETAILS:		
1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(B) FOR SLUDGES): EPA Methods TRC and DO measurement are not currently approved.	used for	□Y ØN □NA □NE
IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED:		□Y ☑N □NA □NE
SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT: Thermometers in all sample refrigerators have not been calibrated against a certified thermometer since 2009.		□Y ☑N □NA □NE
4. QUALITY CONTROL PROCEDURES ADEQUATE:		☑Y □N □NA □NE
5. DUPLICATE SAMPLES ARE ANALYZED ≥10% OF THE TIME:		☑Y □N □NA □NE
6. SPIKED SAMPLES ARE ANALYZED ≥10% OF THE TIME:		☑Y □N □NA □NE
7. COMMERCIAL LABORATORY USED:		☑Y □N □NA □NE
a. LAB NAME: ETG American Interplex		
b. LAB ADDRESS: 1702 E. Central Ave, Bentonville, AR 72712 8600 Kanis Rd., Little	Rock, A	AR 72204
c. PARAMETERS PERFORMED: CBOD5, TSS, NH3-N, TP, TRC, NO3-N Biomonitoring		
8. BIOMONITORING PROCEDURES ADEQUATE:		☑Y □N □NA □NE
a. PROPER ORGANISMS USED:		☑Y □N □NA □NE
b. PROPER DILUTION SERIES FOLLOWED:		⊠y □n □na □ne
c. PROPER TEST METHODS AND DURATION:		Øy □n □na □ne
d. RETESTS AND/OR TRE PERFORMED AS REQUIRED:		Øy □n □na □ne

ADEQ Water NPDES Inspection	AFIN: 04-00106	Permit #: AR0020273

SECTION	G: EFFLUEI	NT/RECEIVIN	IG WATERS	OBSERVATION	ONS					
	BASED ON VISUAL OBSERVATIONS ONLY									
DETAILS:	DETAILS:									
OUTFALL #:	OUTFALL #: OIL SHEEN GREASE TURBIDITY VISIBLE FOAM FLOATING SOLIDS CO									
001	None	None	None	None	None	Clear				
			I	I	L		1			
SECTION	H: SLUDGE	DISPOSAL								
SLUDGE D	DISPOSAL ME	ETS PERMIT F	REQUIREMENT	ΓS		Øs □m □	U □NA □NE			
DETAILS:	Sludge is dispo	sed at Waste N	lanagement La	ndfill in Tontito	wn, AR					
1. SLUDGE M	IANAGEMENT ADEQU	ATE TO MAINTAIN EF	FLUENT QUALITY:		*	⊠s □м	□u □na □ne			
2. SLUDGE R	ECORDS MAINTAINED	AS REQUIRED BY 40) CFR 503:			□s □м	□u □na ☑ne			
3. FOR LAND	APPLIED SLUDGE, TY	PE OF LAND APPLIE	TO: (E.G., FOREST,	AGRICULTURAL, PUE	BLIC CONTACT SITE):					
SECTION	I: SAMPLIN	G INSPECTION	ON PROCEDI	JRES						
SAMPLE F	RESULTS WITH	IIN PERMIT R	EQUIREMENT	S		□ѕ□м□	U □NA ☑NE			
DETAILS:										
1. SAMPLES	OBTAINED THIS INSPE	ECTION:				□Y	□n □na ☑ne			
2. TYPE OF S	SAMPLE: GRAB:	□COMPOSITE: N	METHOD: FREQUE	NCY:						
3. SAMPLES	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 DEV	/ICE:			□Y	□n □na Øne			
6. SAMPLE R	EPRESENTATIVE OF \	OLUME AND NATUR	E OF DISCHARGE:			□Y	□n □na ☑ne			
7. SAMPLE S	PLIT WITH PERMITTE	≣:				□Y	□n □na ☑ne			
8. CHAIN-OF-	CUSTODY PROCEDUI	RES EMPLOYED:				□Y	□N □NA ☑NE			
9. SAMPLES	COLLECTED IN ACCO	RDANCE WITH PERM	IT:			□Y	□n □na ☑ne			
	J: STORM V									
STORM W	ATER MANAG	EMENT MEET	S PERMIT RE	QUIREMENTS		□s □m □	U □NA ☑NE			
DETAILS:										
1. SWPPP UP	PDATED AS NEEDED:	_ DATE OF LAST UP	DATE:			□Y	□N □NA ☑NE			
2. SITE MAP	INCLUDING ALL DISCH	HARGES AND SURFAC	CE WATERS:			□Y	□n □na ☑ne			
3. POLLUTIO	3. POLLUTION PREVENTION TEAM IDENTIFIED:									
4. POLLUTIO	4. POLLUTION PREVENTION TEAM PROPERLY TRAINED:									
5. LIST OF POTENTIAL POLLUTANT SOURCES:										
6. LIST OF PO	6. LIST OF POTENTIAL SOURCES AND PAST SPILLS AND LEAKS:									
7. ALL NON-S	STORM WATER DISCH	ARGES ARE AUTHOR	IZED:			□Y	□n □na ☑ne			
8. LIST OF ST	RUCTURAL BMPS:					□Y	□N □NA ☑NE			
9. LIST OF NO	D. LIST OF NON-STRUCTURAL BMPS:									
10. BMPS PRO	D. BMPS PROPERLY OPERATED AND MAINTAINED:									
11. INSPECTIO	ONS CONDUCTED AS I	REQUIRED:				□Y	□N □NA ☑NE			

		FLOW CA	ALCULATION	SHEET					
Date: 03/	21/12	Time: 105	50						
Head in Inc	hes:	Feet:	0.85						
Type & Size of Primary Flow Measurement Device: 5 foot rectangular weir without end contractions									
Name & Mo	odel of Second	ary Flow Mea	surement De	evice: A	BB Transmitter Flowmeter				
Date of last	: Calibration of	Socondany	low Dovice:	02/20/42					
	Flow at Date &			MGD	(Facility Flow Meter)				
	Flow at Date 8 ted using flow charts			I3 MGD urement Har	ndbook-5 th Edition)				
% Error =	Recorded Va	llue - Caldalculated Val	culated Value	X 100)				
% Error =	9.86	8.43	8.43	X 100)				
% Error =	1.43 8.43	X 100							
% Error =	0.17	X 100							
% Error =	17	%							
Comments	: Deviation >	+/- 10%. Isc	o flow meter	not in use) .				

DMR Calculation Check

Reporting Period: From 11 11 01 To 11 11 30 Year Month Day Year Month Day

Parameter Checked: CBOD5

	Loading Mass	Concentration Monthly					
	Mo. Avg lbs/day	Mo. Avg mg/l	7-day Avg mg/l				
Reported Value:	60.6	1.61	2.57				
Calculated Value:	60.6	1.61	2.57				
Permit Value:	550	15	22.5				

If calculated value does not equal reported value, explain:

DMR Calculation Check

Reporting Period:	From	11	11	01	To	11	11	30
		Year	Month	Day	_	Year	Month	Day

Parameter Checked: TSS

	Loading Mass	Concentration Monthly					
	Mo. Avg lbs/day	Mo. Avg mg/l	7-day Avg mg/l				
Reported Value:	97.4	2.5	<u>5.0</u>				
Calculated Value:	97.4	2.5	3.0				
Permit Value:	734	20	30				

If calculated value does not equal reported value, explain:

Facility is not reporting the 7-day average in the manner defined by Part IV (18) of the permit. The reported value was for a sample taken on Wednesday, November 30, 2011. The date on Saturday of that calendar week was December 3, 2011.

NPDES Compliance Inspection Report Further Explanation

The following violations were noted at the time of the inspection:

- 1. Flow-proportioned samples are not being taken for parameters that require 24-hour composite samples. Operator indicated that composite samples are time weighted only.
- 2. Because 24-hour time-weighted composite samples have been taken for effluent parameters requiring 24-hour flow-proportioned composite samples, it has not been possible for the facility to report accurate mass-loading rates for these parameters on their monthly discharge monitoring reports.
- 3. Monitoring procedures violations:
 - a. It is necessary for the facility to supplement cooling of samples to 6 degrees C with ice in the influent and effluent refrigerators. These refrigerators are not functioning as designed and must be replaced.
 - b. Fecal coliform bacteria samples are being collected with an unsterilized scoop.
 - c. All sample refrigerator thermometers have not been calibrated against a certified thermometer since 2009.
 - d. Records indicate that the facility's lab is using EPA Method 360.1 for dissolved oxygen analysis and EPA Method 330.5 for total residual chlorine analysis. These procedures are not currently approved by 40 CFR Part 136.
- 4. Facility's standard operating procedures must be updated. For example, the SOP for measuring dissolved oxygen does not reference a test procedure approved by 40 CFR 136, but rather references a method internally designated as WW006.
- 5. Only one of the two generators used for standby power was in service at the time of the inspection. According to staff, the north generator was taken out of service during construction related to the POTW expansion. The south generator does not provide backup power to all of the plant's treatment units.
- 6. Excessive grease and algae buildup on the weirs of the primary clarifier and excessive algae buildup on the weirs of the two final clarifiers was causing short circuiting of flow in each of these clarifiers.
- 7. At the time of the inspection, the effluent flow measurement devices were not capable of measuring flows with a maximum deviation of less than +/- 10% from true discharge rates. In addition, flow through the primary device was turbulent, causing significant fluctuations in the water level as it flowed past the gauge used to measure head in this device.
- 8. Facility is not reporting 7-day averages in the manner as defined in Part IV of the permit.

Note: The grit chamber, one of the two primary clarifiers and the primary sludge thickener were not operable at the time of the inspection.

			Wate	er Division NPDES Photo	ographic Ev	idence Sheet		
Location:	City	y of Sil	oam Spri	ngs Pollution Control Plan	nt			
Photograph	ner:	John F	azio		Witness:	James Eng, I	EPA Region	n 6
Photo #	1	Of	6		Date:	03/21/12	Time:	1034

Description: Excessive algae buildup on weirs at final clarifier causing short circuiting.



Photograph	ner:	John F	azio	Witness:	James Eng, l	EPA Region	n 6
Photo #	2	Of	6	Date:	03/21/12	Time:	1032

Description: Excessive algae buildup on weirs at final clarifier causing short circuiting.



			Wate	er Division NPDES Photo	ographic E	vidence Sheet		
Location:	City	of Sil	oam Spri	ings Pollution Control Plan	nt			
Photograph	er: J	ohn F	azio		Witness:	James Eng, I	EPA Region	n 6
Photo #	3	Of	6		Date:	03/21/12	Time:	1054
Description:		ABB T	ransmitte	er Flowmeter used as seco	ndary efflue	ent flow measur	ing device.	



Photographe	er: Jo	ohn Fa	azio			Witness:	James Eng,	EPA Region	n 6
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Description: Turbulent flow through the primary flow measuring device.

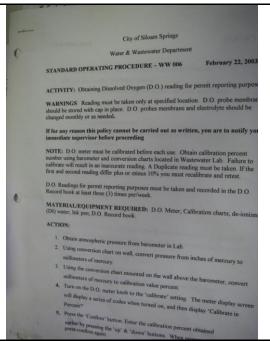


			Wate	er Division NPDES Photo	ographic E	vidence Sheet		
Location:	City	of Sil	oam Spri	ngs Pollution Control Plan	nt			
Photograph	ner: J	ohn F	azio		Witness:	James Eng, I	EPA Region	n 6
Photo #	5	Of	6		Date:	03/21/12	Time:	1130
Description	: T	urbul	ent flow	through the primary flow	measuring d	levice before pa	ssing over	the weir.



Photograph	er:	John F	azio		Witness:	James Eng,	EPA Region	n 6
Photo #	6	Of	6		Date:	03/21/12	Time:	1304
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Description: SOP for measuring dissolved oxygen does not reference a test procedure approved by 40 CFR 136.





May 29, 2012

Sent Via E-Mail and Certified U.S. Mail

Water Division Enforcement Branch Arkansas Department of Environmental Quality 5301 Northshore Drive North Little Rock, Arkansas 72118-5317 Water-Inspection-Report@adeq.state.ar.us

To Whom It May Concern:

Enclosed please find the City of Siloam Spring's response to the Arkansas Department of Environmental Quality Inspection Report, dated May 16, 2012. If you have any questions regarding the City's response, please contact me at (479) 524-5136. Thank you.

Sincerely,

Randy Atkinson

City of Siloam Springs

Public Works Director

Enclosure

cc: Parthy Evans, Stinson Morrison Hecker

John Fazio, District 1 Inspector

CITY OF SILOAM SPRINGS RESPONSE TO ADEQ INSPECTION REPORT (MAY 16, 2012) MAY 29, 2012

The Arkansas Department of Environmental Quality ("ADEQ" or "the Department") conducted an inspection of the City of Siloam Springs ("the City") wastewater treatment facility ("WWTF") on March 21, 2012. The Department submitted its findings from the inspection in a report ("Inspection Report") to the City dated May 16, 2012, which the City received on May 17, 2012. The Inspection Report contains eight numbered alleged violations. The Inspection Report requests a written response to each alleged violation by May 29, 2012. This letter is intended to respond to each alleged violation contained in the May 16, 2012, Inspection Report.

1. Your permit states that 24-hour flow-proportioned composite samples must be collected for several effluent parameters. However, Jack Harriston, Operator, stated that the Isco automatic effluent sampler was disconnected from the Isco effluent flow meter during POTW expansion construction, and that it is not connected to the ABB transmitter flow meter currently in use. Mr. Harriston stated that the sampler is programmed to collect effluent portions every hour, not proportional to flow, indicating that the plant has been collecting 24-hour time-weighted composite samples. This is in violation of Part 1.A, Part II.B.1.a. and Part II.C.1 of your permit. Refer to Part IV (20) of your permit for the definition of 24-hour composite sample.

<u>Response</u>: The City's Authorization to Discharge Wastewater Under The National Pollutant Discharge Elimination System and the Arkansas Water and Air Pollution Control Act Permit No. AR0020273 ("NPDES Permit") defines "24-hour composite sample" in Part IV, paragraph 21 as:

"a minimum of 12 effluent portions collected at equal time intervals over the 24-hour period and combined proportional to flow <u>or</u> a sample collected at frequent intervals proportional to flow over the 24-hour period." (emphasis added)

The City collects its 24-hour composite samples in accordance with the second provision of the definition, as it collects samples "at frequent intervals proportional to flow over the 24-hour period." To accomplish this, the City uses an ISCO sampler, which gathers flow measurements and collects a 400-milliliter sample after every 100,000 gallons of water is measured by the ISCO meter associated with the ISCO sampler. Thus, the samples are not collected based on time-intervals, but rather are collected proportional to flow. As the average daily flow is approximately 2.7 million gallons per day, more than 12 aliquots are collected for each composite sample.

As further information, the ISCO sampler is programmed to collect a sample after every 100,000 gallons of flow in accordance with the ISCO operator manual. The 100,000-gallon threshold was selected based on the average daily WWTF flow, and ensures samples are collected at an appropriate flow-based frequency to be representative of the discharge. The relevant pages of the ISCO operator manual, including the Program Sequence Structure, are attached hereto as

1

¹ In addition, the ISCO flow meter was calibrated the week of the March 2012 inspection. It has been re-calibrated in the last 14 days to ensure proper operations. In addition, the City performs regular spot-check calibrations on the flow meter.

Attachment 1. The ISCO sampler allows the operator to view the Sequence Structure on the machine. The City has purchased and installed an analog ISCO sampler as part of its continual upgrade programs. The new ISCO sampler allows the City to view and store information regarding the flow and aliquot collection for a 45-day period, and allows the information to be downloaded into a database.

The Inspection Report indicates that an ABB flow meter is in use. While this is true, the ABB flow meter was used only for collecting the daily flow readings from the WWTP. It is not connected to the ISCO sampler and no information from the ABB flow meter was used in association with collection of 24-hour composite samples, as they serve entirely distinct purposes. The ISCO sampler collects aliquots, based on flow, for effluent sample purposes, while the ABB sampler takes flow measurements based on million gallons per day to provide the daily flow measurement required by the NPDES Permit. A photo of the ABB sampler is attached to the Inspection Report. The ISCO sampler is located approximately 100 yards away from the ABB sampler. The inspectors did not inspect the ISCO sampler and ISCO meter during the March 21, 2012, inspection.

The Inspection Report indicates that Mr. Harriston stated that the 24-hour composite samples are time-proportional, not flow-proportional. The City regrets any misunderstanding that there may have been in discussions regarding the composite sample collection methodology.

As discussed above, since issuance of the Permit, samples have been conducted on a flow-proportional basis. Thus, as the City was not in violation of its Permit, the City requests this alleged violation be removed from the Inspection Report.

2. Because 24-hour time-weighted composite samples have been taken for effluent parameters requiring 24-hour flow-proportioned composite samples, it has not been possible for you to report accurate mass-loading rates for these parameters on your monthly discharge monitoring reports (DMRs). This is in violation of Part 1.A and Part II.C.1 of your permit.

Response: As discussed above, 24-hour composite samples were appropriately collected in accordance with the NPDES Permit requirements and the ISCO Operator Manual. After collection, samples are sent to a certified lab for analysis, and reported in monthly Discharge Monitoring Reports. Thus, accurate mass-loading rates were reported in DMRs, and revised calculations are unnecessary. The City requests this alleged violation be removed from the Inspection Report.

- 3. The following are violations of Part II.C.3 of your permit:
 - a. According to Mr. Harriston, bagged ice must be used to supplement cooling of samples to 6 degrees C in your influent and effluent refrigerators. These refrigerators are not functioning as designed and must be replaced.

Response: Condition II.C.3 of the Permit requires the permittee to:

"perform maintenance procedures on all monitoring and analytical instrumentation ... to insure accuracy of measurements and shall insure that both calibration and maintenance activities will be conducted."

As a preliminary response, the sample refrigerator on the ISCO sampler does not constitute "monitoring and analytical instrumentation." Thus, Condition II.C.3 is not directly relevant to this issue. The City also notes that it did comply with its requirement to keep samples below the Part 136-required temperature of 6 degrees Celsius. Eight Chain of Custody forms are attached hereto as Attachment 2. The Chain of Custody forms are from February 2012 (the month prior to the inspection) and May 2011, and are representative of consistent, continued compliance with the 6-degree Celsius storage temperature requirement. Thus, the City requests this alleged violation be removed from the Inspection Report.

The new ISCO analog sampler that has been installed has a built-in refrigerator. The City will continue to monitor and calibrate the temperature in the new refrigerator, as discussed below in response to Item 3(c).

b. Mr. Harriston stated that fecal coliform bacteria (FCB) samples are being collected with an unsterilized scoop. FCB sampling equipment must be sterilized prior to each sampling event.

Response: Prior to the inspection, the City conducted its fecal coliform bacteria samples as follows. The City used clean sample techniques, such as requiring the sampler to wear gloves, and collecting the sample with a scoop that was kept in a sterilized container. The City sent samples to the laboratory in a sterilized sample bottle. However, as noted in the Inspection Report, the scoop was not independently sterilized. After the inspection, the City ceased use of the scoop. All equipment that is used to collect fecal coliform bacteria samples is now sterilized, and the sample is collected with a sterilized container. Clean sampling procedures are also still employed by all sample collection personnel.

c. All sample refrigerator thermometers have not been calibrated against a certified thermometer since 2009.

Response: The refrigerator thermometers are calibrated as required. The Inspection Report notes that the thermometers had not been calibrated since 2009. This is incorrect. In 2009, the City purchased new thermometers and installed them in its refrigerators. This is the 2009 date reflected on the thermometers. To calibrate the thermometers, the City uses a certified thermometer, which is calibrated every two years. The certified thermometer was purchased on August 2, 2010, and is accurate until August 2, 2012. A new thermometer will be obtained prior to August 2012. The City uses the certified thermometer to calibrate the refrigerator thermometers and other temperature-controlled units on a weekly basis. An example of the calibration checks for one of the refrigerator thermometers is attached hereto as Attachment 3. If

a refrigerator thermometer is not working properly, it is replaced. Thus, the City requests this alleged violation be removed from the Inspection Report.

d. Your records indicate that your lab is using EPA Method 360.1 for dissolved oxygen analysis and EPA Method 330.5 for total residual chlorine analysis. These procedures are not currently approved by 40 CFR Part 136.

Response: The City uses EPA Method 330.5 to measure total residual chlorine. ADEQ has informed the City that this is an acceptable method for NPDES purposes, as it is equivalent to EPA-approved Part 136 Method 4500-CL-G. Correspondence from Ms. Jane Hurley is attached hereto as Attachment 4. The City uses EPA Method 360.1 to measure dissolved oxygen. ADEQ has informed the City that this is an acceptable method for NPDES purposes, as it is equivalent to EPA-approved Part 136 Method 4500-O-G. See Attachment 4.

4. Your standard operating procedures (SOP) must be updated. For example, the SOP for measuring dissolved oxygen does not reference a test procedure approved by 40 CFR 136, but rather references a method internally designated as WW006. This is in violation of Part II.B.1.a of your permit

Response: The Inspection Report indicated that the City's SOPs constituted a violation of Condition II.B.1.a of the Permit because they did not list an explicit reference to an EPA-approved Part 136 Method. The City disagrees that the forms were in violation of Condition II.B.1.a. which states that:

"The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control ... which are installed or used by the permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures."

The City does not believe this provision is relevant to its internal Standard Operating Procedures ("SOP"). The internal SOPs do not constitute a treatment or control system. Thus, the City requests that this alleged violation be removed from the Inspection Report.

To the extent a response is still required, the City's SOPs are created for internal use and reference. The dissolved oxygen SOP, which is referenced in ADEQ's Inspection Report, is internally designated as WW006. The WWTF operators and persons collecting samples from the WWTF understand that EPA Part 136-approved methods or methods otherwise approved by ADEQ should be used for sample analysis. Nevertheless, to avoid future confusion, the SOPs are being updated to include on the first page, in addition to the internal reference number, the EPA Part 136-approved Method number. The City requests this alleged violation be removed from the Inspection Report.

5. Only one of the two generators used for standby power was in service at the time of the inspection. According to Mr. Harriston, the north generator was taken out of service during construction related to the POTW expansion. The south generator does not provide backup power to all of the plant's treatment units. This is in violation of Part II. B.7 of your permit

Response: Presently there are two generators at the WWTF – the north generator, which is located on the north side of the property and has been in use for some years, and the south generator, which is located on the south side of the property and was installed as part of the WWTF improvements project that began in 2009. The south generator was designed to provide backup power to all vital treatment units at the WWTF, and the north generator, which will be abandoned in place as noted on the design drawings for the WWTF improvements (see sheet 70-E-501 of the WWTF design drawings). Thus, the City is in violation of Condition II.B.7, and the City requests this alleged violation be removed from the Inspection Report.

6. Excessive grease and algae buildup on the weirs of the primary clarifier and excessive algae buildup on the weirs of the two final clarifiers was causing short circuiting of flow in each of these clarifiers. This is in violation of Part II.B.l.a of your permit. These conditions could cause overflow of settling solids into the launders during high flow periods. Cleaning of the weirs should take place as necessary to allow for equal and unobstructed flow through each of the weirs.

<u>Response</u>: The City is in compliance with its effluent limits. However, the City understands the importance of cleaning the weirs to allow unobstructed flow. Therefore, the City has implemented a more rigorous procedure for checks and cleaning of the weirs at the clarifiers to allow minimal algal growth. The City has also already developed an SOP to reflect this practice. The SOP is attached as Attachment 5. Recent photos of the weirs are attached as Attachment 6.

7. Part II.C.2 of your permit states that flow measurement devices must be capable of measuring flows with a maximum deviation of less than +/- 10% from true discharge rates throughout the range of expected discharge volumes and shall be installed at the monitoring point of the discharge. The meter at the primary flow measurement device was not in service (see Item 1 above). According to Mr. Harriston, an alternate flow meter (ABB transmitter flow meter) has been used to measure flow. This meter measures flow through a pipe from the final clarifiers to the primary flow measurement device. At the time of the inspection, the discharge rates between the primary flow device and the ABB transmitter deviated by 17%. In addition, flow through the rectangular weir was turbulent, causing significant fluctuations in the water level as it flowed past the gauge used to measure head in this device.

Response: During the March inspection, the City was using the ABB flow meter, described in response to alleged violation No. 1, to calculate daily flow from the WWTF. The ABB meter was last certified in February 2012. Since the March inspection, the City has purchased and

installed a new ISCO sampler and flow meter that will be used for calculating flow for reporting purposes. The new ISCO flow meter will be properly maintained and calibrated to provide accurate flow measurements.

8. Part IV (18) of your permit states that the 7-day average discharge limitation is the highest allowable arithmetic mean (geometric mean for FCB) of the values for all effluent samples collected during the calendar week. It states that the DMR should report the highest 7-day average obtained during the calendar month, and that for reporting purposes, the 7-day average values should be reported as occurring in the month in which the Saturday of the calendar week falls in. Total suspended solids (TSS) and total phosphorus (TP) concentrations in the effluent samples taken on Wednesday, November 30, 2011 were 5.0 mg/L and 1.18 mg/L, respectively. These are the 7-day average values you reported for these parameters on your November 2011 DMR. Review of your records indicates that 7-day average values of 3.0 mg/L TSS and 0.46 mg/L TP should have been reported on your November 2011 DMR.

Response: The City has revised the November and December 2011 Discharge Monitoring Reports to move the Saturday December 4, 2011, sample result to the appropriate DMR month. The November and December DMRs are attached hereto as Attachment 7. The City does note that despite the placement of Saturday December 4, 2011, result in the November DMR, the City remained in compliance with its effluent limits for both November and December 2011. The City has also reviewed its last three years of data to ensure that similar mistakes were not made. As part of its evaluation, the City identified additional DMRs with similar issues. They are attached hereto as Attachment 8.

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Attachment 1

City of Siloam Springs

Response to ADEQ Inspection Report (March 21, 2012)

May 29, 2012

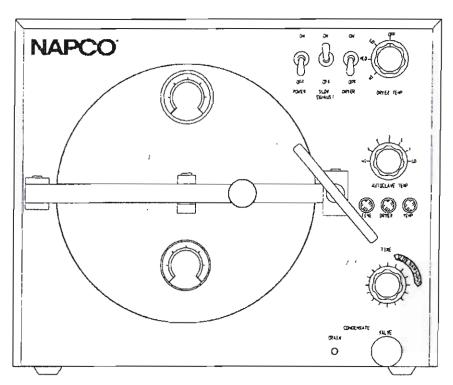
Installation/Service Manual

Slow Exhaust Autoclave

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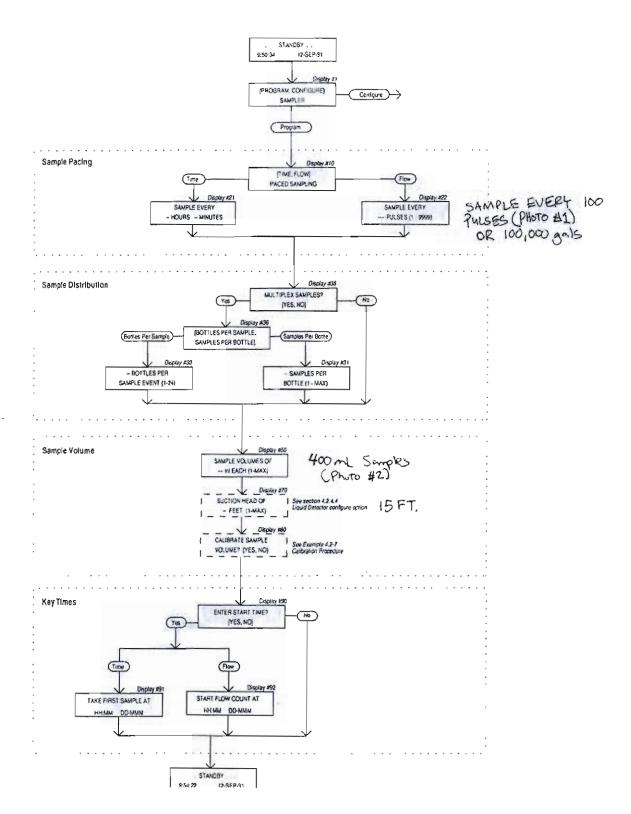




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Figure 9. Basic Programming Mode: Program Sequence Structure



Attachment 2

City of Siloam Springs

Response to ADEQ Inspection Report (March 21, 2012)

May 29, 2012

City of Siloam Springs

CITY OF SILOAM SPRINGS

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Siloan Spaper AR 975 Anderson Avenue website: siloamsprings.com

Siloam Springs, AR 72761 P.O. Box 80

WATER POLLUTION CONTROL FACILITY

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CITY OF SILOAM SPRINGS

975 Anderson Avenue Siloam Springs, AR Springs, AR Swam Springs, AR 72761 website. siloamsprings.com

P - Box 80

WATER POLLUTION CONTROL FACILITY

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website: siloamsprings.com

CITY OF SILOAM SPRINGS

WATER POLLUTION CONTROL FACILITY

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website: siloama, nings.com

Swam Springs AR 72761 ♥ U. Box 80

CITY OF SILOAM SPRINGS

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Circumstant Springs

WATER POLLUTION CONTROL FACILITY

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CITY OF SILOAM SPRINGS

BE10222-01 C

Sicern Springs, AR 975 Anderson Avenue website. shamapnings.com Silcam Springs, AR 72761 P.O. Box 80

WATER POLLUTION CONTROL FACILITY

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A10 N. Broadway Siloam Springs Ar 72761 Sprin	Address	P.O. Box 80			Project Orc	fer #			30	65	20	95	96	06	0 = 1
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City of Stloam Springs

CITY OF SILOAM SPRINGS

975 Anderson Avenue P.O. Bo Silvam Springs, AR Silvam Springs, Com-website silvamsprings.com

Siloam Springs AR 72761 P.O. Box 80

WATER POLLUTION CONTROL FACILITY

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Attachment 3

City of Siloam Springs

Response to ADEQ Inspection Report (March 21, 2012)

May 29, 2012





Calibration complies with ISO 9001 ISO/IEC 17025 AND ANSI/NCSL Z540-1



Certificate No. 1750.01

Cert. No.: 4152-3082329

Traceable® Certificate of Calibration for Full-Scale Thermometer

Manufactured for and distributed by: Fisher Scientific, P.O. Box 1768, Pittsburgh, PA 15230 Instrument Identification:

Model: 15-077-23

S/N: 101860047

Manufacturer: Control Company

Standards/Equipment:

Description	Serial Number	Due Date	NIST Traceable Reference
Temperature Calibration Bath TC-231	A79341		
Temperature Probe	3039	12/10/10	A9B23080-1
Thermistor Module	A17118	11/19/10	A9B21010
Temperature Calibration Bath TC-256	B01375		
Thermistor Module	A27129	8/09/10	1000264338
Temperature Probe	157	8/27/10	A9708011-4

Certificate Information:

Technician: 68

Procedure: CAL-03

Cal Date 8/02/10

Cal Due: 8/02/12

Test Conditions:

26.0°C

41.0 %RH 1015 mBar

Calibration Data: (New Instrument)

Unit(s)	Nominal	As Found	In Tot	Nominal	As Left	In Tol	Min	Max	±U	TUR
°C		N.A.		0.00	-0.6	Y	-1.0	1.0	0.06	>4:1
°C		N.A.		100.00	99.6	Y	99.0	101 0	0.06	>4:1

This Instrument was calibrated using Instruments Traceable to National Institute of Standards and Technology.

A Test Uncertainty Ratio of et least 4.1 is maintained unless otherwise stated and is calculated using the expanded measurement uncertainty. Uncertainty ovaluation includes the instrument under test and is calculated in accordance with the ISO "Guide to the Expression of Uncertainty in Measurement" (GUM). The uncertainty represents an expanded uncertainty using a coverage factor is?

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Nominal#Standard's Reading; As Left-Instrument's Reading, in Tol-In Tol-Income; Min/Max=Acceptance Range; ±U=Expended Measurement Uncertainty, TUR=Test Uncertainty Relic; Accuracy=s(Max-Min)/2; Man = Nominal(Rounded) - Tolerance; Max = Nominal(Rounded) - Tolerance; Dista-Nation(Rounded) - Tolerance; Dista-Nation(Rounded) - Tolerance; Max = Nominal(Rounded) - Tolerance; Max = Nominal(Roun

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Wallace Renry

Maintaining Accuracy:

In our opinion once calibrated your Full-Scale Thermometer should maintain its accuracy. There is no exact way to determine how long calibration will be maintained. Full-Scale Thermometers change little, if any et all, but can be affected by aging, temperature, shock, and contamination.

Recalibration:

For factory calibration and re-certification traceable to Malianal Institute of Standards and Technology contect Control Company

CONTROL COMPANY 4455 Rex Road Friendswood, TX 77546 USA
Phone 281 482-1714 Fax 281 482-9448 service@control3.com www.control3.com

LABORATORY TEMPERATURE CHECKLIST

MONTI	MARCH	YEAR	2012
-	The surface of the participation of the surface of		

		REFRIGERATOR	FC INCUBATOR	DRYING OVEN	MUFFLE FURNACE	DI WATER	ANALYST
DAY	TIME	4 C	44.5 C +/2 C	103-105 C	500 C +/- 50 C	LIGHT ON	
1	0830	4.	44.50	104.	OFF	V	JUS
2	0815	40	DEF	1040	OFF		TUP
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4	-						
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12	0800	40	off	1040	off	\ \	JUH
13	1100	4.	44.50	1040	off	~	JULT
14	0900	4	44.5"	1040	OFF	~	JUH
15	0740	И°	OFF	1040	OFF	~	JUH
16	0800	W .	OFF	1040	OFF	~	Jr.H
17					Servingers		
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19	0810	4"	OFF	104	OFF	V .	JUH
20	0950	4.	44.5'	1070	oFF	V	JUH
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28	1115	Ч.	44.5	104.	OFF	·/	JLH
29	0700	4.	OFF	104.	OFF	V	JLH
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Attachment 4

City of Siloam Springs

Response to ADEQ Inspection Report (March 21, 2012)

May 29, 2012

Tom Myers

From:

Hurley, Jane <HURLEYJ@adeq.state.ar.us>

Sent:

Monday, May 21, 2012 2:01 PM

To:

Tom Myers

Subject:

RE: Laboratory Approved Methods

Yes, both are acceptable for NPDES purposes.!

anni

From: Tom Myers

Sent: Monday, May 21, 2012 1:59 PM

To: Hurley, Jane

Cc: Randy Atkinson; Justin Bland Subject: Laboratory Approved Methods

ADEQ Jane Hurley Chemist Supervisor

Jane,

Good Afternoon Ma'am!

I have a couple of questions regarding testing methods and if they are approved by ADEQ.

- Method (1) is for Total Residual Chlorine. This is a Hach Method 8167 also referred to as 330.5 and is our method of choice for running Total Residual Chlorine. Hach Chemical statement is; this procedure is equivalent to USEPA method and Standard Method 4S00-CL G
- 2. Method (2) is for dissolved oxygen. The method of choice is for Membrane Electrode Method referred to E.P.A. 360.1 or the Standard Method 4500-O-G which is checked with the Winkler method for reference. Membrane Instrument: YSI Model 52.

I look forward to hearing back from you regarding this information. If we need to make any needed changes please let me know?

Thank you,

Tom Myers
Environmental Compliance Manager
City of Siloam Springs

Ph: 479-524-5623 Cell: 479-228-0934 Fax: 479-524-4653

Attachment 5

City of Siloam Springs

Response to ADEQ Inspection Report (March 21, 2012)

May 29, 2012

SILOAM SPRINGS, ARKANSAS

May 24, 2012

City of Siloam Springs Water/Wastewater Department

POLICY & PROCEDURE FOR CLEANING FINAL CLARIFIERS

<u>Purpose:</u> The purpose of this Operating Instruction is to outline the procedures to be followed by all employees of the Wastewater department for the proper and timely cleaning of the final elarifiers.

- 1. <u>Scope:</u> This Operating Procedure applies to all Wastewater personnel under the direction of the Superintendent of Wastewater.
- 2. <u>Responsibility:</u> The Wastewater Superintendent and Assistant Wastewater Superintendent will be responsible for the procedure and adherence of the policy as outlined. The Superintendent of Wastewater will be responsible to discipline any employee which fails to follow this policy.
- 3. <u>Requirements:</u> The final clarifiers must be cleaned on a weekly basis to maintain safe and reliable operation.

4. Procedure:

The final clarifiers are to be cleaned a minimum of once per week, more often when necessary. The operator of the day will be responsible for checking the cleanliness and condition of the final clarifiers daily.

5. Reports:

The operator should notify the supervisor of any circumstance that prevents the adherence of this policy.

5. Records:

The action of cleaning the final clarifiers will be recorded in the operations log book and initialed. It will be the duty of the Wastewater Supervisor to review these records on a regular basis.

Director of Water & Wastewater Utilities:	
Operations Controller:	
Effective Date:	

#1 FINAL CLARIFER CLEANING LOG

Date	TIME	INITIALS	Date	TIME	INITIALS
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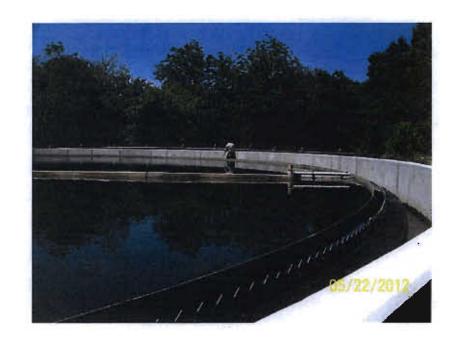
Date	TIME	INITIALS	Date	TIME	INITIALS
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			,		

Attachment 6

City of Siloam Springs

Response to ADEQ Inspection Report (March 21, 2012)

May 29, 2012





Attachment 7

City of Siloam Springs

Response to ADEQ Inspection Report (March 21, 2012)

May 29, 2012

Form Approved

PERMITTEE NAME: AODRESS (Include Paciny Name Location of Different)

SILOAM SPRINGS CITY OF ADDRESS: NAME

POLLUTION CONTROL FACILITY SILOAM SPRINGS, AR 72761

975 ANDERSON AVE SILOAM SPRINGS AR 72761 SILOAM SPRINGS, CITY OF LOCATION: FACILITY:

ATTN THOMAS MYERS/DAVIC CAMERON.ADM

FROM

A-100

AR0C20273

DISCHARGE NUMBER MONITORING PERIOD 11/30/2011 0 MM/DD/YYY PERMIT NUMBER 11/01/2011

DMR Mulling ZIP CODE: MAJOR

No Discharge 001-MONTHLY-TRTD MUNICIPAL WW External Outfall

PARAMETER		QUAN	QUANTITY OR LOADING	n	σ	QUALITY OR CONCENTRATION	CENTRATION		ĞΧ	FREQUENCY OF ANALYSIS	SAMPLE
		VALUE	VALUE	UNITS	VALUE	VALUE	VALUE	STINO			
Oxygen dissolved (DO)	SAMPLE	***		ı	8.02	}		1/6m	0	Weekly	Grab
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110	SAMPLE	******	-	ļ	7.13	***************************************	77.77	S.U.	0	Five fer Month	Grab
CHuent Gross	PERMIT		,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,		MINIMINIM	*****	MAXIMUM	ns		Twrce Per Month	GRAB
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O0530 1 0 Effluent Gross	PERMIT	734 MO AVG		Ibiel	e a righte de	2C NO AVG	30 7 DA AVG	Pigir.		Weekly	COMP24
Nifragen, animona total (as N)	SAMPLE	0.5	***	16/4		0.03	0.05	mg/L.	0	Weekly	Compa
5Muent Grass	PERMIT	147 MO AVG		piq		MO AVG	7 DA ANG	/ugi/L	-	Weekly	COMP24
Phosphorus (otal (as P)	SAMPLE	19.3		15/4	1	0.49	10,10	maple	0	Weekty	Compay
00665 1 0 Effluent Gross	PERMIT	37 MO AVG	17944	b _e d	140 mg	MO AVG	DAY VO.	- Figur		Weekly	COMP24
Flow, in conduit or thru treatment plant	SAMPLE	4.1	5.3	P/Pop/M	*****	*****	1.000	****		Dish	Totals
60050 1 0 Effluent Gross	PERMIT	Reg Man MO AVG	Reg. Mon. DAILY MX	Mgalid	noden.		11110		11	OBILITY	TOTALZ
Chlorine, total residual	SAMPLE	******			******	441612	0.03	1119/	0	Weekly	Brab
50060 1 g Effluent Gross	REQUIREMENT	sans.		******			INST MAX	Jugy.		Weekly	GRAB

TELEPHONE	17952456	REA COME NUMBER
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NAMEMITLE PRINCIPAL EXECUTIVE OFFICER	Momes A. Myers	TYPED ORPRINTED

COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)

REPORT FLOWAS MONTHLY AVG. & DAILY MAX, IN MGD (MILLION GALLONS DAY). SEE PART IV ITEM #47(A) SEE PARTIIL CONDITIONS #11, #12, A #13,

12/19/2011

DATE

MMIODYPTY

04-00108

07/07/2011

Corrected Report in Approved NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) DISCHARGE MONITORING REPORT (DMR)

PERMITTEE NAME/ADDRESS (Include Facility Name/Location if Different)

SILOAM SPRINGS, CITY OF ADDRESS: NAME

POLLUTION CONTROL FACILITY SILOAM SPRINGS, AR 72761 FACILITY:

975 ANDERSON AVE SILOAM SPRINGS, AR 72761 SILOAM SPRINGS, CITY OF LDCATION:

ATTN: THOMAS MYERS/DAVIO CAMERON, ADM

FROM

DISCHARGE NUMBER A-100 AR0020273 PERMIT NUMBER

MM/DD/YYYY 12/31/2011 MONITORING PERIOD 2 MINIDDAYYY 12/01/2011

DMR Mailing ZIP CODE:

MAJOR

No Discharge 001-MONTHLY-TRTD MUNICIPAL WW External Outfall

PARAMETER		QUAN	ANTITY OR LOADING	•	ŏ	QUALITY OR CONCENTRATION	ENTRATION		₹ ₩	PREQUENCY OF ANALYSIS	SAMPLE
		VALUE	VALUE	UNITS	VALUE	VALUE	VALUE	UNITS			
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F	SAMPLE	-		-	7.25	erhea	7.66	Su	0	Four Per	drab
00400 1 0 Effluent Gross	PERMIT	ankles]	-	MINIMUM	Bestra	MAXIMUM	ns		Twice Per Month	GRAB
Solids, total suspended	SAMPLE	47.5	Preset	19/91	*****	2.0	3:0	And /L	0	Weekly	Comos
00530 1 0 Effluent Gross	REQUIREMENT	734 MO AVG	traffer.	p/qj	£ 4.	ZO MO AVG	30 7 DA AVG	Jugy.		Weekly	COMP24
Nitrogen, ammonia total (as N)	SAMPLE	0.54	l	16/4	*****	0.03	0.04	mg/L	0	Weekly	Consag
00610 1 1 Effluent Grass	PERMIT	MO AVG	Valuet	p/qi	Berne	MO AVG	7 DA AVG	They.		/ ANSEM	COMP24
Phosphorus, total (as P)	SAMPLE	11.32	Table 1	19/9	-	0.48	25.68	Ser.	0	Vicekly	Conody
00665 1 0 Effuent Gross	PERMIT	37 MO AVG	Miles	thrd	Mater	MO AVG	7 DA AVG	-¥9∕L		Weekly	COMP24
Flow, in conduit or thru treatment plant	SAMPLE	2.7	3.8	Madila	1	and a	Bangen	1		Daily	Totale
50050 1 0 Effluent Gross	PERMIT	Reg. Mon. MO AVG	Rag, Mon. DAILY MX	Mgalfo	Maper	estapen	run	dame.		AlleQ	TOTALZ
Chlorine, total residual	SAMPLE	******	Banks	retere.	est the same	eres.	0.03	Mall	0	Weekly	Grab
50060 1 0 Effluent Gross	REQUIREMENT	fattant	spanser .	Malaa	Aftha	Yelady	INST MAX	frg/L		Weekly	GRAB

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NAME/TITLE PRINCIPAL EXECUTIVE OFFICER	Thomas A. Myers	LASSELL STORY STORY STORY CONTROL TYPED OR PRINTED

REPORT FLOW AS MONTHLY AVG. 8 DAILY MAX. IN MGD (MILLION GALLONS/DAY). SEE PART IV, ITEM #47(A). SEE PARTIII, CONDITIONS #11, #12 & #13. COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all stachments here)

04-00106

DATE

TELEPHONE

479-524-5623 NUMBER

AREA Code

07/07/2011

Attachment 8

City of Siloam Springs

Response to ADEQ Inspection Report (March 21, 2012)

May 29, 2012

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)

PERMIT LE NAMERADDRESS product indity Name Location if Informity

SILOAM SPRINGS, CITY OF ADORESS: NAME

POLLUTION CONTROL FACILITY SILOAM SPIRINGS, AR 72761 SHOOM SPIRINGS, CITY OF FACILITY:

975 ANDERSON AVE SILOAM SPRINGS, AR 72761 LOCATION

ATTIN: THOMAS MYERSADAVID CAMERON, ADM

DISCHARGE NUMBER 001A PERMIT NUMBER

AR0020273

MM/DD/YYYY 03/31/2010

MM/DD/YYYY 03/01/2010

10

FROM

MONITORING PERIOD

72761 DMR Malling ZIP CODE: MAJOR

CEAT MO YEAR THE

I CAT ADJUMENT

001-MONTH Y-TISTD MUNICIPAL WW

No Discharge External Outall

mt9 2 Sur Post Gmet Grab SAMPLE Grab Weakly Comed COMIZA CCMAINS IUIA. Z Meeklylonah COMPZ CAN GIVE 5 month Mee Jely Weekly Weekly PRECOUNCY OF ANALYSIS Twice Per Daily Weekly Weekly Weekly Workly Daily 호 0 0 0 0 0 mall T/ PW UNITS SU ; 35 700 AWG . 9 38 47.3 4.80 MAXIMUM 7 DA AVG 7 IN AVG 0 QUALITY OR CONCENTRATION VALUE 0.03 **** ***** ... **** 3.99 MO AVG MUAVG MO AVG VALUE 0 : : ***** 0.5 ***** ;;;; ****** ***** ***** 49 MC AV MN MINIMUM VALUE 7.09 ***** -: į **** Maald UNITS 16/3 : 15/4 byc QUANTITY OR LOADING PART MAN VALUE : : : : : ; * 9000 MO AVE MO AVG Reg. No. VALUE MO AVG ::: m : **** -マゲー SAMPLE SAMPLE SAMPLE SAMPLE SAMPLE SAMPLE PERMIT PERMIT REQUIREMENT REQUIREMENT PERMIT REQUIREMENT REQUIREMENT leav, in conduit or thru traditions plan Nitogen, armonda folal (as N) ARAMETER Phosphurus, total (as 12) hygen, dissolved (DO) Solids, total suspended Chiorino, total residual Conson 1 0 Consist of Consistent Choses 00530 1 0 Filteral Gross 006 10 1 1 I filtrent Gioss 50050 1 0 Filtrent Gross Cillingal Gloss

SIGNATORE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here) Wa ste water Syde ristenders. NAME/TITLE PRINCIPAL EXECUTIVE OFFICER

REQUIREMENT

50050 1 0 Fillheril Gross

AFFORT FLOW AS MONTHLY AVE. & DAILY MAX, IN MGD (MILLION GALLONS DAY) SEF FART IV, ITEM MATA), SEE FARFII, CONDITIONS #11, #12 8 #13.

D4-80105

GRAB

Weekly

INS! MAX

4/20/10

479-338-0924

AKEN COMP

DATE

TELEPHONE

RAMADOWYY

NATIONAL POLLUTANT (JISCHALKSP EI IMINATION SYSTEM (NPDES) (SOURCE)

DISCHARGE MONITORING REPORT (DMR)

DAME NO 2040-3054

Been Approved

PERMITTEE NAME/ADDIRESS (Inchash Facility Marter, nother if Different)

SILOAM SPRINGS, CITY OF POLLUTION CONTROL, FACILITY SILOAM SPRINGS, AR 72761 ADDRESS: NAME:

SHOAM SPIRINGS, CITY OF FACILITY:

875 AND REON AVE. SILOAM SPRINGS, AR 72761 LOCATION:

AT IN: THOMAS MYERS/DAVID CAMERON, ADM

A100

DISCHARGE NUMBER

PERMIT NUMBER

AR0020273

DMR Maiding ZIP CODE: MAJOR

72761

001-MONTER Y-TREE MUNICIPAL WWF

External Outfall

No Discharge

05/31/2010 2 05/04/2010 FROM

MMADDAYYY

MINIDDINYYY

MONITORING PERIOD

PARAMETER		DUANT	QUANTITY OR LOADING		Jo	QUALITY OR CONCENTRATION	ENTRATION		NO. EX	FREQUENCY OF ANALYSIS	SAMPLE
		VALUE	VALUE	UNITS	VALUE	VALUE	VALUE	UNITS			
Oxygen, dissolved (DO)	SAMPLE	-		-	7.14	*****		ng /c	0	Weekly	Grab
00300 1 0 Effluent Gross	REQUIREMENT	Chatte	*****		MO AV MN	spense	*****	Ingil.		Weekly	GRAB
pl4	SAMPLE	opens	-		6.48	ance	6.82	54	0	4 month	Grah
00400 1 0 Effluent Gross	PERMIT	44445	******		MINIMUM	0.000	MAXIMUM	ns:		Tevice Per Month	GRAH
Solids, total suspended	SAMPLE	55.3	1	19/9		4.38	6.0	7/644	0	Weekly	Guray
00530 1 0 Efflorit Gross	PERMIT	734 MO AVG		lh/d	,,,,,,	20 MO AVG	30 7 DA AVG	high		Weekly	COMP24
Nitrogen, annonia total (as N)	SAMPLE	51.39	*****	P/71	*******	3.77	3.99	Mg 14	oly	Weekly	Gmody
OOG10 1 0 Effluent Gross	PERMIT	SS MO AVG	41111	pyd	11400	MO AVG	7 DA'AVG 7	rfig/L	1	Weokly	COMP24
Phosphous, lotal (as P)	SAMPLE	7.82	******	P/91	41949	0.64	0.36	109/L	0	Weekly	Compain
00665 1 0 Filtient Gross	PERMIT	37 MO AVG	01*6**	Byd	16000	MO AVG	7 DA AVG	lugui,		Wenkly	COMP24
Flow, in conduit or thru treatment plant	SAMPLE	2.1	5.9	May 16	41344	, , , , , , , , , , , , , , , , , , ,	*****			Daily	Totale
50050 1 0 Effuent Gross	PERMIT	Reg. Mon. MO AVG	Reg. Mon. DAILY MX	Mgniki	114400	******	******	120041		Daily	TOTALZ
Chlorine, total residual	SAMPLE	*******	******	******	GARLE	***************************************	0.03	male	0	Weekly	Grab
Souton of the Effluent Grass	REQUIREMENT	******	lines.		*****		INST MAX	MgA		Workly	GRAB

Howas A. Myens Vasta water Sufferitional NAME/TITLE PRINCIPAL EXECUTIVE OFFICER

REPORT FLOW AS MONTRLY AVO. & DAILY MAX, IN MGD (MILLION GALLONS/DAY). SEE PART IV, ITEM #47(A), SEE PARTIII, CONDITIONS #11, #12.8.#13,

SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR ALTHORIZED AGENT COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)

06-23-201

479 2380927 NUMBER

AREA Gode

DATE

TELEPHONE

MANDOWNY

04-00106

Court From Approved

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PERMITTEE NAME/ADDRESS (Include Facility Name), acabas II (2000-140)

POLLUTION CONTRO!, FACILITY SILOAM SPRINGS, AR 72761 SILOAM SPRINGS, CITY OF AODRESS:

SII OAM SPRINGS, CLLY UF FACILITY:

975 ANDIERSON AVE SILOAM SPRINGS, AR 72761 LOCATION:

ATTN: THOMAS MYERSKIDAVIL) CAMERON.ADM

FROM

DISCHARGE NUMBER A-100

AR0020273

MM/DD/YYY 09/30/2010 MONITORING PERIOD 10 MINIDONYYY PERMIT NUMBER 09/01/2010

No Discharge

DO1-MONTH (LY-TRTD MUNICIPAL WW

External Outfall

DMR Malling ZIP CODE:

MAJOR

lonpay SAMPLE somo poly COMP24 Weekly Grub COMP24 GRAB Weekly PREQUENCY OF AMAI YSIS Mackly Weekly Weekly S X 10001 UNITS 7 DA GEO 7 DA AVG VALUE 208 QUALITY OR CONCENTRATION Red Mon. 30DA GEO 1.03 VALUE MO AVG 137.1 VALUE **** : ***** CNITS 16/dl P/91 F QUANTITY OR LOADING VALUE ****** **** ***** : 20.57 Red Mon. MO AVG VALUE SAMPLE SAMPLE REQUIREMENT REQUIREMENT SAMPLE PERMIT REQUIREMENT BOD, carbonaccours, 05 day, 20 C Nilrogen, nifrate total (as NO3) PARAMETER Coliform, fecal general 74055 1 0 Effluent Gross BODB2 1 to Efflicat Gross 71850 1 0 Effluent Gross

CONTRACT LABORATORY E. T. B.

1702 E. Central Ave Suite 10

Bentonville, AR 727/2

DATE	10/21/201	MANDONYYY
TELEPHONE	380927	R OR AMER CIMES NUMBER
TE TE	479	OR NHFA CINE
all	les	MVE OFFICER
1	The	ALTHORIZED AGENT
11/20	1 10/21/200	SIGNATURE OF PRINC
as in the line account as the line at was per print the base for	the first of the f	· the ci
NAME/TITLE PRINCIPAL EXECUTIVE OFFICER	Thomas A. Myers	TYPED OR PRINTED

COMMENTS AND EXPLANATION OF ANY WOLATIONS (Reference all attachments here)

REPORT FLOW AS MONTHLY AVG & DAILY MAX, IN MGD (MILLION GALLONSDAY), SEE PART IV, ITEM 447(A), SEE PARTIII, CONDITIONS 811, 912 & 813.

EAA Form 1226-1 [Rev. 81705] Previous editions may be used,

Page 2

04-00 105

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DISCHARGE MONITORING REPORT (DMR)

PERMITTER NAME/ADDRESS (Indute Facility Name/Lamilon if Dillyrant)

POLIUTION CONTROL FACILITY SILOAM SPRINGS, AR 72761 SILOAM SPRINGS, CITY OF ADDRESS:

SILOAM SPRINGS, CITY OF

LOCATION:

AT IN: THOMAS MYERS/DAVID CAMERON ADM

975 ANDERSON AVI-SILOAM SPRINGS, AR 72/01

DISCHARGE NUMBER 001-A

PERMIT NUMBER

AR0020273

MINITODIVIVY 03/31/2011

MM/DD/YYYY

2

03/01/2011

FROM

MONITORING PERIDD

DIMR Mailing ZIP CODE MAJOR

OMB (on 2040 0014

Corrected Rout

No Dischargo 001-MONTHLY-TRTD MUNICIPAL WW External Outfall

Totale SAMPLE brab Vieekly Compast Grab Gras (smp d omod TOTALZ COMP24 COMP24 COMP24 GRAB GRAB GRAB Feekly Smonth Vicelain weekly Weckly FREQUENCY OF AMALYSIS Month Month Daily Woekly Weekly Whekly Weekly Weekly Donly O SX O 0 O 7/000 いっちんん 7/ 5m 1/6/J UNITS SU ****** mgh. S 345 7.66 0.14 0.02 7 DA AVG MAXIMUM TON AVG 7 DA AVG INST MAX VALUE 1 ***** QUALITY OR CONCENTRATION 1 **** 8.16 90.0 BAV OW MO AVG VALUE MOAVG : i -***** ***** -3 160 7.33 MINIMON MO AV MN VALUE ***** ***** ****** ****** 4164 ***** Magal 4 16:0 SLIND 15/4 Ú. 111111 . h)/d 10 QUANTITY OR LOADING 3 6 Reg. Mon. VALUE :::: ***** 54.27 216 Red. Mon. MO AVG MO AVG MO AVG VALUE 0.5 .,.,. ***** **** SAMPLE SAMPLE SAMPLE SAMPLE SAMPLE PERMIT SAMPLE PERMIT PERMIT REQUIREMENT PERMIT SAMPLE PERMIT REQUIREMENT PERMIT Flow, in conduit or thru treatment plan Nitrogen, annuania total (as N) PARAMETER Phosphorus, (otal (as P) Oxygen, dissolved (DO) Solids, total suspended Chlorine, total residual 00530 1 0 Effluent Gross 00610 1 1 Effluent Gross DOBGS 1 D Effluent Gross 50050 1 0 Effluent Gross 50060 1 0 Effluent Gross 00300 1 0 Effluent Gross 00400 1 0 Effluent Gross

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REPORT FLOW AS MONTHLY AVG. & JANILY MAX. IN MGD [MILLION GAL] ONSDAY, SEE PART IV. ITEM #47(A), SFE PARTIIL. CONDITIONS #11, #12 & #13. COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)

04-00106

04,21,3011 **FATTOGETY**

4795245623

NUMBER

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SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

DATE

TELEPHONE

EPA Form 3278-1 (Rev. 61/06) Previous eilitions may in used.

Page 1

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) COLLECTED KEPPT

PERMITTEE NAME/ADDRESS (Inchide Facility Name Location if Offerent)

POLLUTION CONTROL FACILITY SILOAM SPRINGS, AR 72761 SILDAM SPRINGS, CITY OF ADDRESS: NAME:

SILOAM SPRINGS, CITY OF LOCATION: FACILITY:

975 ANDERSON AVE SILOAM SPRINGS, AR 72761

ATTN THOMAS MYERS/DAVID CAMERON.ADM

FROM

001-A DISCHARGE NUMBER ARMOZOZOZ 73 PERMIT NUMBER

MM/OD/YYYY 03/31/2011 MONITORING PERIOD 2 MIMICIDATYYY 03/01/2011

DMR Mailing ZIP CODE:

Form Approved CNAB No 2046-0004

MAJOR

001-MONTHI Y-TRTD MUNICIPAL INV External Outlan No Discharge

PARAMETER		DUANTII	JANTITY OR LOADING		ō	QUALITY OR CONCENTRATION	ENTRATION		E.O.	PREQUENCY OF ANALYSIS	SAMPLE
		VALUE	VALUE	STINO	VALUE	VALUE	VALUE	UNITS			
Nitrogen, nitralo total (as NO3)	SAMPLE	134.89	-	16/4	1	5.77	10.4	make	- 23	Weskin	Grad
71850 1 0 Effueni Gross	PERMIT	Reg. Mon. MO AVG	-	bkdl	******	Reg. Mon MO AVG	Red Mon.	mfgAL		Weekly	COMP24
Collform, fecal general	SAMPLE	1		1	*****	313.5 1258	1258	# 100m	0	ikekly	Brak
74055 1 1 Efflicent Gross	PERMIT		*****		******	1000 300A GEO	2000 7 DA GFO	#/ 100mil		Wenkly	GRAB
BOD, carbonaceoirs, 05 day, 20 C	SAMPLE	43.4	•••••	19/91		1.81	15	mall	0	Meckly	Jeans?
80082 1 0 Effuent Gross	PERMIT	550 / MO AVG	*****	lb/d	44444	15 MO AVG	7 DA AVE	1 Angri.		Weakly	COMP24

Contract Laboratory

1702 E. Central

Bentonville, AR 78712

on March 22 and 29 was roport to Endy Barner Office Contract Laboratory. Note: Phosphorys Excusion Upon notification from

the sector presents of the died that described it is all the forces were proported to the contract of the cont	a se che juanes datel acqueside le gallere perchasise de un transfer Freche bestiendet zu beleit ive averte zu trougen fre paraller balle. Ber se utwenfart cilu sufanden jeziklige ibr perchaden et ive anti-mers-en iver-
NAMETITLE PRINCIPAL EXECUTIVE OFFICER THE SECOND AND ADDRESS OF THE SECOND ASSESSMENT OF THE SE	Thomas the imposite the solution of the soluti

MONATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

REPORT FLOW AS MONTHLY AVG & DAR.Y MAX, IN MGD (MILLION GALLONSTDAY) SEF PART IV, ITEM MAY(A), SEF PARTIII, CONINTIONS #11, #12 & #13, COMMENTS AND EXPLANATION OF ANY WOLATIONS (Reference all ettechments here)

479524-5623

AREA Code

TELEPHONE

04-00106

PERMITTEE NAME/ADITRESS (Inchide Facility Name/Location II Dillerent)

SILOAM SPIRINGS, CITY OF POLLUTION CONTROL LACILLY SILOAM SPIRINGS, AR 72761 AODRESS:

SILOAM SPRINGS, CITY OF FACILITY:

975 ANDERSON AVE SII OAM SPRINGS, AR 72761 LOCATION:

ATTN: THOMAS MYTHRADAVID CAMERON, ADM

	BER
A-100	SCHARGE NUN

MM/DD/YYYY 04/30/2011 MONITORING PERIOD 10 MINIDDIMYY PERMIT NUMBER 04/01/2011 AI30020273

DAR No MAINCH DIMR Mailing ZIP CODE: 72761

Frem Approved

MAJOR

001-MON 111 Y-TRTD MUNICIPAL WW External Coutfull

No Discharge

PARAMETER		QUANTI	JANTITY OR LOADING	·	a	QUALITY OR CONCENTRATION	ENTRATION		NO.	PREQUENCY OF ANALYSIS	SAMPLE
		VALUE	VALUE	UNITS	VALUE	VALUE	VALUE	UNITS			
Oxygen, dissolved (IX)	SAMPLE		-	1	7,41			ing h	0	Week-14	Grab
00300 1 0 Fiftuent Gross	PERMIT	4414		*****	MO AV MN	***************************************	*******	Willy.		Weekly	GRAB
PH	SAMPLE	******	10000	1	7.18		7.60	NS	0	Month	Grab
ODADO 1 O Fineral (Fides	PERMIT	******			MINIMIAN	*****	MAXIMUM	SI		Twice Per Month	
Solkls, total suspended	SAMPLE	154.5	*******	16/4		4.0	5 4 5	Ing 11-	Ü	Weekly	Lemo 24
OOSAO 1 O Effkent Gross	PERMIT	NO AVG	*****	llyci	*******	MO AVG	30 7 137 AVG	utiju		Wassidy	COMPZA
Nitrogen, ananonia total (ns N)	SAMPLE	2.59	***	18/4		0.086	5,82	A19/L	0	Weekly Goods	Gema 29
DOG10 1 2 Effluent Gross	PERMIT	MO AVG	*******	PAII	Parkber	1.5 I/O AVG	3.8 7.03.AVG	Milth		Weekly	COMP74
Phosphorus, tolai (as I¹)	SAMPLE	12.35	-	16/4		C.39	0.40	Small	do a	Mekly	Lemo 24
00665 1 0 Fiftuent Gross	PERMIT	MO AVG		lb/c)	*****	MO AVG	1.5 7 DA AVG	-fright.		Weekly	COMP24
How, in conduit or thru heatment plant	SAMPLE	3.0	6.5	May 1/4	*****		*******			Weekly	Totals
Sooso 1 0 Fillient Gross	PERMIT	Reg. Mon. MO AVG	Req. Mon. DAILY MX	Mgalid		10000		*****		Aliaci	TOTALZ
Chlorine, total residual	SAMPLE	******	*****	14444		******	0.03	male	0	Weekly	Enab
50050 1 0 I Muent Gross	PERMIT	*******			· vive	areare	INST MAX	убиц		Wenkly	HVND

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TYPED OR PRINTED		

REPORT FLOW AS MONTHLY AVG. & DAILY MAX, IN MGD (MILLION GALLONS/DAY), SHE PART IV, HEM \$47(A), SHE PARTINI, CONDITIONS \$11, \$12 & \$13.

04-00106

5,43,401

479-504-5623

OFFICER OR

TELEPHONE

PERMITTEE NAME/ADDRESS (Inchade Facility Name/Location if Different)

SILOAM SPRINGS, CILY OF POLLUTION CONTROL FACILITY SILOAM SPRINGS, AR 77761 ADDRESS:

SILOAM SPIRINGS, CILY OF FACILITY:

ALTN: THOMAS MYERSAJAVID CAMERON, ADM 975 ANDERSON AVF SILOAM SPRINGS, AR 72761 LOCATION:

001-A DISCHARGE NUMBER MMIDDAYYY MONITORING PERIOD AR0020273 PERMIT NUMBER MM/DD/YYYY 04/01/2011

04/30/2011

D

FROM

DMR Mailing ZIP CODE: 72761

Agentin Angresed

001-MONTHLY-TRID NUNICIPAL WW

No Discharge External Outfall

PARAMETER		QUANTE	QUANTITY OR LOADING		ō	QUALITY OR CONCENTRATION	ENTRATION		ŠΩ	OF AHALYSIS	SAMPLE
		VALUE	VALUE	UNITS	VALUE	VALUE	VALUE	UNITS	ā.		
Nitrogen, nitrale total (as NO3)	SAMPLE	178.75	777	19/91	1	.5.12	8.29	7/04		Weckle	Gapay
71856 1 0 Effluent Gross	PERMIT	Reg. Mon. MO AVG	44444	hvii	P-1914	Req. Mon.	Reg. Mon. 7 DA AVG	Windy.		Whekly	COMP24
Coliform, fecal yeneral	SAMPLE	years.		1	1 1	194.1	253.9	100/	0	Weak!	Grah
74055 1 0 Effluent Gross	PERMIT	******	******		•	300A GEO	400 7 DA GEO	#/1003#		Weekly	GRAB
ROD, carbonaceous, 05 day, 20 C.	SAMPLE	33.6		19/91	:	1.08	1.30	7/611	0	Weekly	62024
80082 1 0 Elfluent Gross	PERMIT	SSD MO AVG	***************************************	Phies		15 MO AVG	22.5 7 DA AVG	pibul		Weekly	COMPA

Contract Laboratory:

E. T.G.

1702 E. Central Ave Bentonville, AR 72712

April 28,2011 Storm manhole Overflow at Plant. Estimated 25,000 gallons ran on ground treated with hydrated line. No Evidance of Adverse Health/Environmental Impact. Called > Cindy Barner phone and left message regarding overflow. Note:

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER	Territoria de raposallo de tración de la companión de la compa	111111111111111111111111111111111111111
Thomas A. Myers	Thomas A. Myers	" Mon Willi
Dastelviater Superintendent	. Description of a management of the control of the	SIGNATURE OF PRINCIPAL EXPCU

REPORT FLOWAS MONTHLY AVG. & DAILY WAX, IN MGD (MILLION GALLONSIDAY), SEE PART IV, ITEM \$44(A), STE PARTIII, CONDITIONS #11, #12 & #13.

COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all strachments here)

DA-0010B

5/33/2011

THE OFFICER OR ANEA CAME NUMBER

TELEPHONE

RINDOMYN

EPA Form 1922-1 (Res. 01/06) Previous additions any he used

PERMITTEE NAME/ADDRESS (Include Facility Nother Cooling of California)

POLLUTION CONTROL FACILITY SILOAM SPRINGS, AR 72761 SILOAM SPRINGS, CITY OF ADDRESS: NAME

SILOAM SPRINGS, CITY OF FACILITY:

975 ANDERSON AVE SILOAM SPRINGS AR 72761 LOCATION:

ATTN THOMAS MYERS/DAVID CAMERON ADM

FROM

DISCHARGE NUMBER MMIDDAYYY 07/31/2011 MONITORING PERIOD 2 AR0020273 PERMIT NUMBER MM/DD/YYYY 07/01/2013

THE SECOND DMR Malling ZIP CODE: Corrected Report

Frit ALL JAS

001-MCNTHLY-TRTD MUNICIPAL WW

External Outfall

No Discharge

PARAMETER		QUANTI	QUANTITY OR LOADING		Ö	QUALITY OR CONCENTRATION	ENTRATION		E.S.	FREDLIENCY OF ANALYSIS	SAMPLE
		VALUE	VALUE	UNITS	VALUE	VALUE	VALUE	UNITS			
Nitrogen, nitrate total (as NO3)	SAMPLE	32.4		P/91		5.55	7.06	1/041	0	Week 74	in sak
71850 1 0 Effluent Gross	PERMIT	Ren, Mor MO AVG	Assession	16:6	*****	Rea Mnn. MO AVG	Ren Mon	nê _t .		Weekly	COMP24
Collform, fedal general	SAMPLE		1	ļ		169.3	220.0	# Nober [0	Heckly	Grab
74055 t U Effluent Gross	PERMIT	the south	10.00			200 33DA GEO	400 7 DA GEO	# Hour.		Weekly	SRAB
BOD, carbonaceoirs, 06 day, 20 C	SAMPLE	17.7	*****	15/4		1.22	14th	1/644	0	Weekly	Compat
80082 1 0 Efflient Gross	PERMIT	550 MO AVIS		p q		MO AVG	7 OK NYG	-4ng-i	Salar Salar	Weekly	COMPZ

Contract Lubber atory

E.T. B. 1702 E. Central Ave. Suite 10 Bentonville, AR 72713

Please Note: Tom Myers Called Alan Anderson to rejort 7 day exceedance on phosyhorus of A.14 maple on July 7, 2011. Call was made 7/18/11 at 3:10 p.m. atter meceiving analytical report.

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER	The state of the second section of the second section of the second section is the second section of	TELEPHONE	DATE
Thomas 13. myers	the thorough the property of t	479.5345623 08/19/2011	08/19/2011
VI 45+ E Water Superiatendent	THE TANK THE BEACH THE STATE OF THE STATE OF PRINCIPAL EXCENTIVE OF AUTHORIZED AGENT	ARLA COR NUMBER	MANDONTA

COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)

REPORT FLOWAS MONTHLY AVG. & DAILY MAX, IN MSD MIL, ION GALLONS/DAY: SEE PART IN ITEM 427A. SEE PARTIEL CONTHINNS \$11. \$12 & #13.

34-00103

PERMITTEE NAME/ADDRESS (Include Facility Name/Location if Different)

POLLUTION CONTROL FACILITY SILOAM SPRINGS AR 72761 SILOAM SPRINGS, CITY OF ADDRESS; NAME:

SILDAM SPRINGS, CITY OF FACILITY:

875 ANDERSON AVE SILOAM SPRINGS, AR 72761 LOCATION:

ATTN: THOMAS MYERS/DAVID CAMERON, ADM

FROM

A-100

DISCHARGE NUMBER MM/DD/YYYY 09/30/2011 MONITORING PERIOD 2 PERMIT NUMBER MMDDMYY 1102/10/60 AR0020273

Form Approved OHB No. 2940-0004 Gorected Report

DMR Mailing ZIP CODE:

MAJOR

001-MONTHLY-TRTD MUNICIPAL WW External Outfall No Discharge

PARAMETER		QUANTI	QUANTITY OR LOADING		g	QUALITY OR CONCENTRATION	SENTRATION		NO.	FREQUENCY OF ANALYSIS	SAMPLE
		VALUE	VALUE	STIN	VALUE	VALUE	VALUE	UNITS			
Nitrogen, nitrate total (as NO3)	SAMPLE	36.36	******	13/4	****	3.61	6.65	Male	0	Weakly	Compas
71850 1 0 Effluent Gross	PERMIT	Reg. Mon. MO AVG	*****	9/4	******	Reg. Mon MO AVG	Reg. Mon. 7 DA AVG	- Way		Weekly (COMP24
Coliforn, fecal general	SAMPLE	1	I	1	*****	101.7	166.0	The The	0	Weekly	Grab
74055 1 0 Effluent Gross	REQUIREMENT	711111	Asset		- Parent	30DA GEO	7 DA GEO	#/190mL		Weekly	GRAB
BOD, carbonaceous, 05 day, 20 C	SAMPLE	11.33	****	P/91	41444	1.02	1.08	maple	0	Weekly	Gross
80082 1 0 Effluent Gross	PERMIT	SS0 MO AVG	****	16/d	6144A	15 MO AVG	7 DA AVG	· /mg/L		Weekly	COMP24

Contract Laboratory E.T.B. 1702 E. Central Ave Suite 10 Bentonville, AR 72712

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TELEPHONE	it that the futuration described, Based on are inspired to the present the names for a three first and the present of the pres	NUMBER
TEL	479.	AREAGOGO
		EROR
•	in	VE OFFIC
1	1	RINCIPAL EXECUTION UTHORIZED AGENT
11	1	NCIPAL
1	de	E OF PRI
THE PERSON	M	SNATUR
ieno!	N N	No.
DINSCEED GRAD	hy regress the register years; I there are sign	Menteral forter
illy inciden peaulith of how for this december and all advantances were prepared under no described or In woman precedence with an elemental post to appare that qualified posterous frequently peaker and	LATER DESIGNERS IN LATER BOTH PARTY IN	The and impr
Afactorette Tere ibit gest	my the section and complete	o personal
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COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments hore)

REPORT FLOW AS MONTHLY AVG. & DAILY MAX. IN MGD (MILLION GALLONS/DAY). SEE PART IV, ITEM #47(4), SEE PARTIII, CONDITIONS #11. #12.8.#13.

04-00108

07/07/2011

10/08/08/11 umpaum

DATE

PERMITTEE NAME/ADDRESS INClude Facility Name/Location & Coffeeol)

POLLUTION CONTROL FACILITY SILOAM SPRINGS, AR 72761 SILOAM SPRINGS, CITY OF ADDRESS:

SILOAM SPRINGS, CITY OF FACILITY:

975 ANDERSON AVE SILOAM SPRINGS, AR 72761 LOCATION:

ATTN: THOMAS MYERS/DAVID CAMERON.ADM

DISCHARGE NUMBER 001-A PERMIT NUMBER AR0020273

MM/DD/YYYY 02/29/2012 MONITORING PERIOD 5 MM/DD/YYY 02/01/2012 FROM

72761 DMR Malling ZIP CODE:

ON NO. 2043-CB34

Corrected Regart

MAJOR

001-MONTHLY-TRTD MUNICIPAL WW External Outlait

No Discharge

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NAME/TITLE PRINCIPAL EXECUTIVE OFFICER Envisormental Lang Visaic Magn Thomas A. Myars

Assistant and the state of the

REPORT FLOW AS MONTHLY AVG. & DAILY MAX, IN MGD (MILLION GALLONS/DAY), SEE PART IV ITEM #91(4). SEE PARTIII. CONDITIONS #11. #12.8 #13.

COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all ettechments here)

479-524-5623 AREA Dode SIGNATURE OF PRINCIPAL EXÉCUTIVE OFFICER OR AUTHORIZED AGENT

6.3/15/2012 AMIDDIANY.

NUMBER

DATE

TELEPHONE

34-00108

07/07/2011

From: Randy

To: <u>Water-Inspection-Report</u>

Cc: "Nancy Clark"

Subject: Inspection Report Response from City of Siloam Springs

Date: Tuesday, May 29, 2012 4:11:41 PM

Attachments: City of Siloam Springs Response to ADEQ Inspection Report (March 21 2012) May 29 2012.pdf

Please find the attached response from the City of Siloam Springs to ADEQ Inspection Report (March 21, 2012). We will send a hard copy via Certified U.S. Mail. Please contact my office if you have any questions.

Randy Atkinson, Public Works Director City of Siloam Springs 479-238-0927 From: <u>Justin Bland</u>

To: Water-Inspection-Report

Subject: FW: City of Siloam Springs, Supplemental Response to ADEQ May 16, 2012, Inspection Report (Permit No.

AR0020273)

Date: Friday, June 15, 2012 2:15:35 PM

Attachments: City of Siloam Springs 6-15-12 Supplemental Response to ADEQ Inspection Report (May 16, 2012).pdf

Mr. Fazio:

ADEQ conducted an inspection of the City of Siloam Springs WWTF on March 21, 2012, and sent the City an Inspection Report on May 16, 2012. The City of Siloam Springs responded to the Inspection Report on May 29, 2012. On May 30, 2012, ADEQ requested additional information to supplement the City's May 29, 2012, response. Attached please find the City's Supplemental Response to ADEQ's May 16, 2012, Inspection Report. Thank you.

Justin Bland, PE
City Engineer
City of Siloam Springs
PO Box 80/ 400 N. Broadway
Siloam Springs, AR 72761
479-238-0921

CITY OF SILOAM SPRINGS SUPPLEMENTAL RESPONSE TO ADEQ INSPECTION REPORT (MAY 16, 2012) JUNE 15, 2012

The Arkansas Department of Environmental Quality ("ADEQ" or "the Department") conducted an inspection of the City of Siloam Springs ("the City") wastewater treatment facility ("WWTF") on March 21, 2012. The Department submitted its findings from the inspection in a report ("Inspection Report") to the City dated May 16, 2012, which the City received on May 17, 2012. The City responded to the inspection report by documents dated May 29, 2012. ADEQ requested additional explanation and/or documentation by e-mail dated May 30, 2012. This Supplemental Response to the ADEQ May 16, 2012, Inspection Report is to provide the additional explanation and/or documentation requested. The May 30, 2012, e-mail requests are repeated below in italics followed by the information requested.

<u>Item I</u>: In the City's response, it is stated that the inspectors did not inspect the Isco sampler and Isco flow meter. James Eng, EPA Region 6, and I did, in fact, inspect the Isco sampler and Isco flow meter during the inspection. It was at that time that the operator informed us that the sampler was not hooked up to any flow meter and that the sampler was simply programmed to collect effluent portions every hour, independent of flow. In the City's response, it is implied that the Isco sampler was hooked up to the Isco flow meter at the time of inspection. If there is any way for you to provide documentation that the sampler was hooked up to the flow meter up to the time and following the time of the inspection, please submit this documentation in your response (i.e., information stored in the sampler regarding the flow and aliquot collection). If this is not possible, please provide us with information regarding who verified that the sampler had actually been hooked up to the sampler, and when they verified this.

Response: The information that the City provided in its May 29, 2012, response regarding the composite sampler and the flow meters is accurate except for the statement that the new ISCO analog sampler and flow meter was installed as of the May 29, 2012 response. The new ISCO analog sampler and flow meter was installed as of June 5, 2012. The City believes that there is confusion regarding the flow meters and the composite sampler that is due to a simple failure to communicate. The City representative on the inspection communicated to the inspectors that the ABB meter is not tied to the ISCO sampler, which is true. However, the City representative did not understand that when he stated that the ABB meter is not tied to the ISCO sampler, the inspectors would interpret that to mean that no flow meter is tied to the ISCO sampler. The ISCO flow meter is connected to the ISCO sampler. The ISCO sampler is located in a building on the northwest corner of the chlorination basin. The ISCO flow meter is in a different building about 20 yards from the small building housing the ISCO sampler. This is the same ISCO flow meter that has been at the same location and has been viewed during prior annual inspections. It is troubling that the ADEQ would think that the City would not have the ISCO sampler connected to a flow meter, as the flow meter dictates the frequency that the sampler collects aliquots for effluent sampling purposes.

The e-mail requests that the City prove that the sampler was tied to the flow meter and suggests providing information stored in the sampler regarding the flow and aliquot collection. The ISCO sampler and ISCO flow meter that were in use until the new ISCO sampler and flow meter were

installed and operating June 5, 2012, did not have information storage and there is not a document that would prove that the sampler was tied to the flow meter. The e-mail suggests providing information regarding who verified that the sampler had actually been hooked up to the flow meter. The connection of the ISCO flow meter to the ISCO sampler is the configuration that is at the essence of the City's use of flow proportional sampling done on the basis of programming the sampler to take an aliquot of effluent approximately every 100,000 gallons of flow. The approximately 100,000 gallons of flow is measured by the ISCO flow meter pulse device. If the sampler were not tied to the ISCO flow meter, the sampler could not draw an aliquot of effluent approximately every 100,000 gallons of flow.

ADEQ previously conducted an inspection of the City's wastewater treatment plant on March 22, 2011. During that inspection, Ms. Alison West used the City's ISCO sampler and associated ISCO flow meter to obtain a 24-hour composite sample. The sampler and flow meter were in the same configuration on March 21, 2012, as they were on March 22, 2011. In addition, the sampler was programmed in March 2012 as it was in March 2011 to collect an aliquot of effluent every 100,000 gallons of flow as measured by the ISCO flow meter. The City representative stated that samples are taken over a 24-hour period and believes that this may have caused the inspectors to have the impression that the sampler is set up to take aliquots each hour. Again, this appears to be a failure to communicate.

<u>Item 3.a</u>: I was incorrect in citing the City in violation of Condition II.C.3 of the permit as the sample refrigerator on the ISCO sampler does not constitute "monitoring and analytical instrumentation". However, according to Jeff Ruehr, ADEQ Chemist Supervisor, because the refrigerators are not functioning as designed (are unable cool to <=6 degrees C without packing the sample bottles in ice) it would be necessary to provide records documenting that the refrigerator temperatures stayed at or below 6 degrees during the 24-hour sampling process. The COCs may show that the samples were received by the lab at the required temperature, but no documentation was provided to show that the sample temperatures were maintained at or below 6 degrees during the 24-hour sampling process.

Response: The City has acted responsibly in responding to refrigerator operation problems by using and replenishing ice to achieve proper cooling in the refrigerator. The City appreciates that ADEQ is concerned that the proper temperature be maintained during sample collection. The City does not maintain records regarding the refrigerator temperature. The City prides itself on the state of the art wastewater treatment plant and on taking the proper operating measures to demonstrate compliance with NPDES effluent limits.

<u>Item 3.c</u>: Your operator stated that the thermometers had not been calibrated since 2009 and did not provide us with any records of weekly thermometer calibration checks. Please provide documentation of the weekly checks for each of the sample refrigerator thermometers for the first two weeks of March 2012.

Response: The requested documentation of weekly laboratory refrigerator thermometer checks was provided to ADEQ as Attachment 3 of the City's May 29, 2012, response. The City checks the laboratory refrigerator thermometers weekly and records the temperature on a "Laboratory Temperature Checklist." The City performs monthly calibration checks of the laboratory refrigerator thermometers by using the certified thermometer as described in the City's May 29, 2012, response to the inspection report.

<u>Item 4</u>: In reference to Condition II.B.1.a of the permit: your SOPs are definitely considered a control used by the permittee to achieve compliance with the conditions of the permit. In the case of an SOP for measurement or analysis of a regulated effluent parameter, the SOP must reference a method currently approved by 40 CFR Part 136. I discussed this issue with James Eng, EPA; Jane Hurley & Jeff Ruehr, ADEQ Chemists; and Dennis Benson, Inspection Branch. Please provide copies of the updated SOPs.

Response: In its May 29, 2012, response, the City stated that it is amending its SOPs to include not only the City's internal reference to the proper test method, but also the EPA approved method number. The updated SOPs for total residual chlorine and for dissolved oxygen are attached hereto as Attachments 1 and 2.

<u>Item 5</u>: Your operator stated at the time of inspection that the south generator did not provide power to all of the plant's treatment units. Your response states that the south generator <u>was designed</u> to provide backup power to all vital treatment units at the WWTF. Please provide documentation that this generator has been connected to and that it can currently provide backup power to all vital treatment units.

Response: The information that the City provided in its May 29, 2012, response is accurate. The City representative's statement is true as well. The south generator provides power to operate all vital plant processes. As further information, the City is providing at Attachment 3 Drawing Numbers 7-E-501 through 7-E-506 of the ADEQ-approved plans and specifications for the wastewater treatment plant improvements. These drawings provide the design details regarding the south generator. The new south generator is connected to and can currently provide backup power to all vital treatment units. It would be difficult to imagine why the City would spend \$24 million on a plant expansion and not provide the necessary backup power thus jeopardizing the investment as well as the purpose of the investment – clean effluent.

<u>Item 7</u>: If indeed the ISCO flow meter was hooked up to the sampler at the time of the inspection, then why wasn't it used for comparing flow between it and the weir during the inspection? It not being used for the "flow check" during the inspection is consistent with the operator's statement about it not being hooked up to the sampler. In addition, the City's response did not address the issue of significant turbulence through the weir.

<u>Response</u>: The ISCO flow meter was hooked up to the ISCO sampler at the time of inspection as it has been at all times. The ABB meter is used to measure daily plant flow and, thus, the ABB meter should have been used for a "flow check."

The turbulence in the weir box for the weir was due to high plant flows as a result of prior rains. The turbulence does interfere with taking readings at the weir, just as it interfered with the reading on the inspection day. The City does not attempt to perform an ABB meter check or an ABB meter calibration on high flow days because the flow does fluctuate in the weir box for the weir. The ABB meter has been inspected and calibrated more often than recommended by the manufacturer and the City believes that it has provided accurate flow readings. The City understands ADEQ's concern with turbulence and is consulting with its design engineers.

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ATTACHMENT 1

CITY OF SILOAM SPRINGS
SUPPLEMENTAL RESPONSE TO ADEQ INSPECTION REPORT (MAY 16, 2012)
JUNE 15, 2012

City of Siloam Springs

Water & Wastewater Department

STANDARD OPERATING PROCEDURE –Total Method Chlorine (Standard Methods 4500-CL G, EPA-approved method, or Method 330.5, ADEQ-approved equivalent method)

ACTIVITY: Obtaining Total Chlorine Residual reading for permit reporting purposes.

WARNINGS: Sample must be taken only at specified location at Effluent. Sample collected and stored according to method. Sterilized container and laboratory equipment used must be first autoclaved. Record time sample collected and ran.

If for any reason this policy cannot be carried out as written, you are to notify your immediate supervisor before proceeding.

NOTE: Chlorine, Total reading for permit reporting purposes must be taken and recorded in the Chlorine Record book when conducting permit reporting. Notify your supervisor immediately if you have a problem with testing.

MATERIAL/EQUIPMENT REQUIRED: Autoclave, sterilized sample bottle with preservative, sterilized laboratory instruments, incubator, Petri-dish, media broth, filters thermometer Calibration Log Sheet.

ACTION:

- 1. Have spectrophotometer on and allow for warm up.
- Pre-sterilization of glass ware and sample contain as required to meet time and temperature.
- Using sterilized bottle collect sample directly into bottle avoid any possible contamination.
- Immediately take to Laboratory to run test as required in Hach method. Please refer to standard methods 4500-CL G to ensure correct protocol is met prior to reporting values.

CONCLUSION: The following policy and procedure has been established to ensure the proper completion of the listed task. Failure to complete the procedure as described will result in discipline up to and including termination of employment.

SOP Chlorine, Total	page 2 of 2
Tom Myers, Wastewater Superintendent	Date
Jack Harrison, Wastewater Asst. Superintendent	Date

ATTACHMENT 2

CITY OF SILOAM SPRINGS
SUPPLEMENTAL RESPONSE TO ADEQ INSPECTION REPORT (MAY 16, 2012)

JUNE 15, 2012

City of Siloam Springs

Water & Wastewater Department

STANDARD OPERATING PROCEDURE – Dissolved Oxygen (Standard Methods 4500-O G, EPA-approved method, or Method 360.1, ADEQ-approved equivalent method)

ACTIVITY: Obtaining Dissolved Oxygen (D.O.) reading for permit reporting purposes.

WARNINGS: Reading must be taken only at specified location. D.O. probe membrane should be stored with cap in place. D.O. probes membrane and electrolyte should be changed monthly or as needed.

If for any reason this policy cannot be carried out as written, you are to notify your immediate supervisor before proceeding.

NOTE: D.O. meter must be calibrated before each use. Obtain calibration percent number using barometer and conversion charts located in Wastewater Lab. Failure to calibrate will result in an inaccurate reading.

D.O. Readings for permit reporting purposes must be taken and recorded in the D.O. Record book at least one (1) time per week. Reading MUST be 7.00 or above. If reading is not 7.00 or above, recalibrate the meter and repeat the process. If reading is still not in the acceptable range notify your supervisor immediately.

MATERIAL/EQUIPMENT REQUIRED: D.O. Meter; Calibration charts; D.I. Water; Ink pen; D.O. Record book.

ACTION:

- 1. Obtain atmospheric pressure from barometer in Lab.
- Using conversion chart on wall, convert pressure from inches of mercury to millimeters of mercury.
- 3. Using chart above, convert millimeters of mercury to calibration value percent.
- 4. Turn on the D.O. meter knob to the 'calibrate' setting. The meter display screen will display a series of codes when turned on, and then display 'Calibrate in Percent?'
- 5. Press the 'Confirm' button. Enter the calibration percent obtained

earlier by pressing the 'up' & 'down' buttons. When proper percent is entered

SOP- Dissolved Oxygen

page 2 of 2

press 'Confirm' again.

- 6. The display will read 'Calibrating', then 'Calibrated to (chart) Percent'.

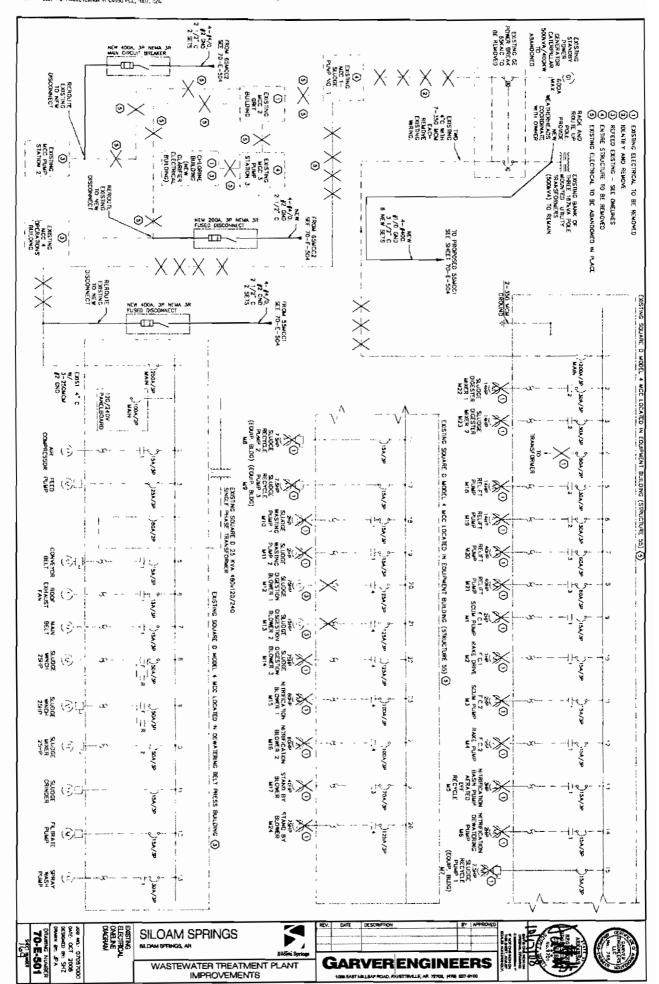
 Turn the knob to the 'O2-Temp' setting.
- 7. Record time of day.
- 8. Remove cap and lower probe into water at specified location. Wait for D.O. reading on display to stabilize, (a star will usually appear on the display when the reading is stable),
- 9. Record this number.
- 10. Record the temperature reading.
- 11. Remove the probe from the sample water and rinse with De-ionized (DI) water.
- 12. Repeat steps h. & i.
- 13. Again remove the probe from the stream and rinse with DI water, make sure it appears to be clean.
- 14. Replace cap on probe end.
- 15. Turn off D.O. meter and return to storage area.
- 16. Please refer to standard methods 4500-0-G to ensure correct protocol is met prior to reporting values.

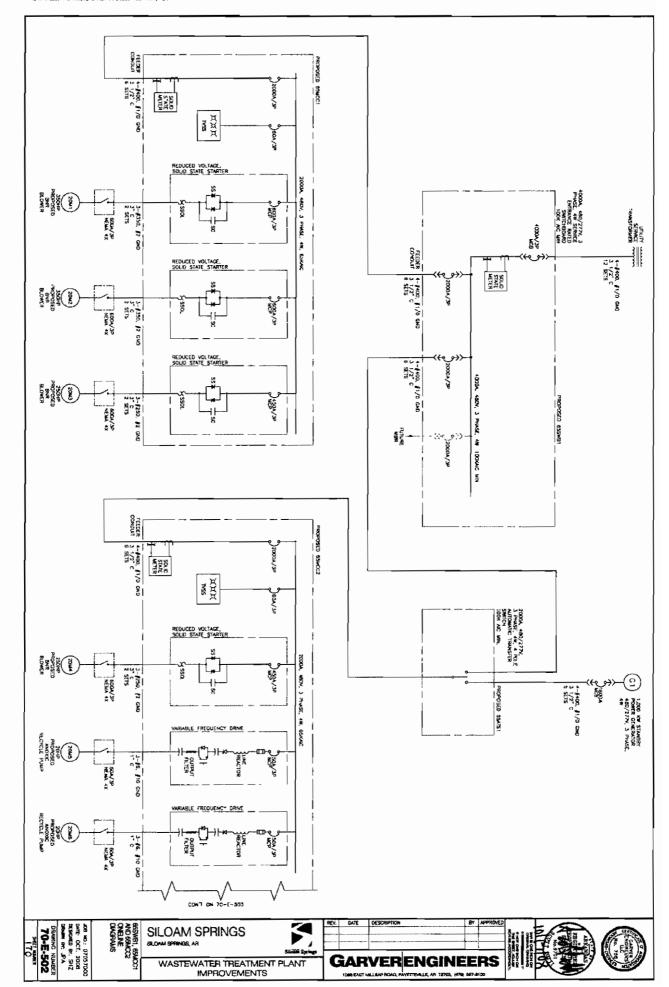
CONCLUSION: The following policy and procedure has been established to ensure the proper completion of the listed task. Failure to complete the procedure as described will result in discipline up to and including termination of employment.

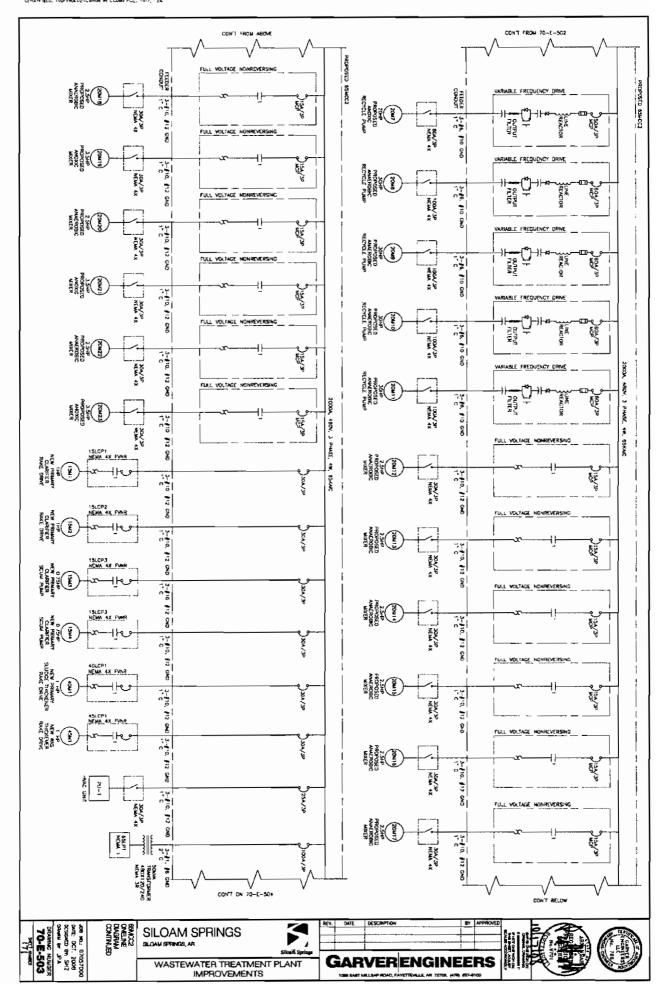
Tom Myers, Wastewater Superintendent	Date
To all The sign and the Area Commission and the state of	D-4-
Jack Harrison, Wastewater Asst. Superintendent	Date

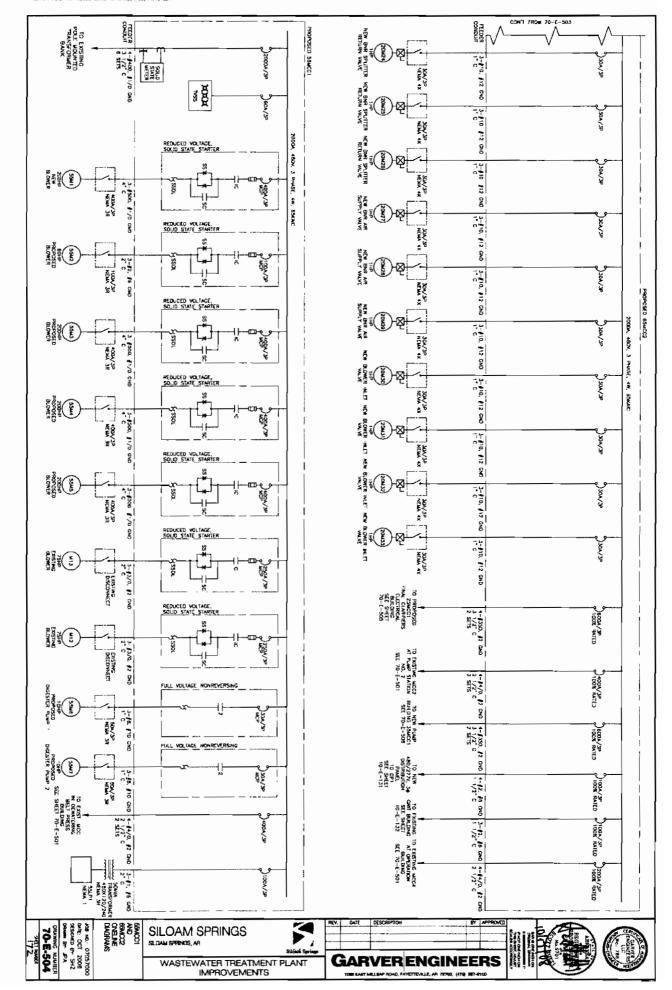
ATTACHMENT 3

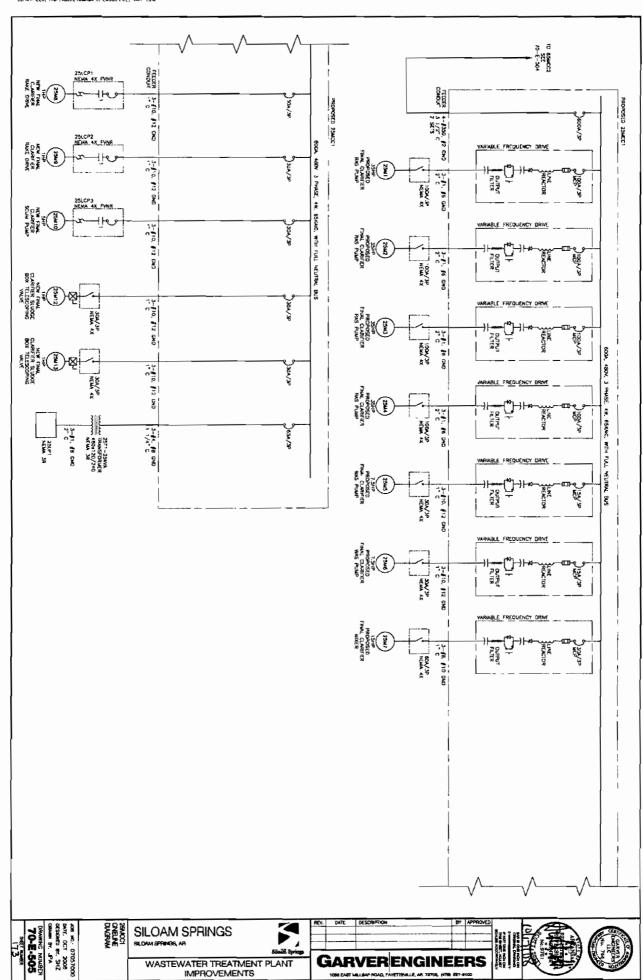
<u>CITY OF SILOAM SPRINGS</u> <u>SUPPLEMENTAL RESPONSE TO ADEQ INSPECTION REPORT (MAY 16, 2012)</u> <u>JUNE 15, 2012</u>

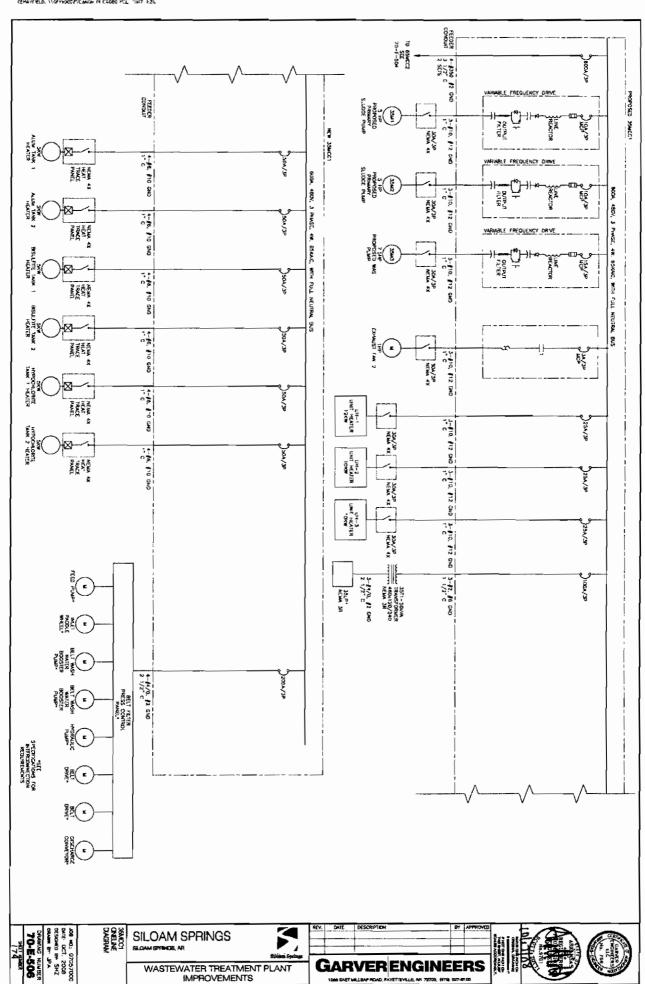












 From:
 Johnson, Steven

 To:
 Miller, Dennise

 Cc:
 Fleming, Eric

Subject: FW: City of Siloam Springs, Supplemental Response to ADEQ May 16, 2012, Inspection Report (Permit No.

AR0020273)

Date: Friday, June 15, 2012 3:09:41 PM

John would like for this email to go with the report. He will be sending an adequate response letter to Siloam Springs.

thanks

From: Fazio, John

Sent: Friday, June 15, 2012 3:02 PM

To: 'Justin Bland'

Cc: Fleming, Eric; Johnson, Steven

Subject: RE: City of Siloam Springs, Supplemental Response to ADEQ May 16, 2012, Inspection Report

(Permit No. AR0020273)

Mr. Bland,

I have reviewed the City's revised response. My comments to the response are below:

Item 1: Again, at the time of the inspection, the operator stated to both James Eng, EPA, and I that the sampler was not hooked up to <u>any</u> flow meter. In addition, I reiterated in the May 30, 2012 email that the operator told Mr. Eng and me that the sampler was programmed to take sample aliquots every hour, independent of flow. So it does seem very reasonable that the ADEQ would take the word of the City's trained, licensed operator.

Item 5: As I reminded you in the May 30, 2012 email, your operator (clearly) stated to both Mr. Eng and I that the south generator did not provide power to all of the plants treatment units.

It appears necessary that the City should make the operator more familiar with exactly how the treatment plant's monitoring and sampling equipment are configured and operate and to which treatment units the south generator provides back-up power.

I will discuss your revised response with my supervisors and possibly enforcement personnel to determine if the response is adequate, as it appears that much of what you have described as confusion can be attributed to what the operator communicated to the EPA and the ADEQ at the time of the inspection.

If you have any questions, you can call me 479-267-0811, ext. 16.

Sincerely,

John Fazio District 1 Inspector Water Division, ADEQ From: Justin Bland [mailto:jbland2@siloamsprings.com]

Sent: Friday, June 15, 2012 2:12 PM

To: Fazio, John **Cc:** Randy Atkinson

Subject: Re: City of Siloam Springs, Supplemental Response to ADEQ May 16, 2012, Inspection Report

(Permit No. AR0020273)

Mr. Fazio:

ADEQ conducted an inspection of the City of Siloam Springs WWTF on March 21, 2012, and sent the City an Inspection Report on May 16, 2012. The City of Siloam Springs responded to the Inspection Report on May 29, 2012. On May 30, 2012, ADEQ requested additional information to supplement the City's May 29, 2012, response. Attached please find the City's Supplemental Response to ADEQ's May 16, 2012, Inspection Report. Thank you.

Justin Bland, PE
City Engineer
City of Siloam Springs
PO Box 80/ 400 N. Broadway
Siloam Springs, AR 72761
479-238-0921



June 18, 2012

David Cameron, City Administrator City of Siloam Springs P.O. Box 80 Siloam Springs, Arkansas 72761

Permit No.: AR0020273 AFIN: 04-00106

Dear Mr. Cameron:

I have reviewed the City's supplemental response pertaining to my March 21, 2012 inspection of the City of Siloam Springs Pollution Control Plant. The information provided sufficiently addresses the violations referenced in my inspection report. At this time, the Department has no further comment concerning this particular inspection. Acceptance of your response by the Department does not preclude any future enforcement action deemed necessary at this site or any other site.

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 479-267-0811, ext. 16, or you may e-mail me at fazio@adeq.state.ar.us.

Sincerely.

John Fazio

District 1 Inspector

Water Division

cc: Water Division Enforcement Branch

Water Division Permits Branch