

ADEQ

ARKANSAS
Department of Environmental Quality

February 15, 2013

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

RE: Compliance Inspections
AFIN: 08-00036, NPDES Permit No.: AR0021865 and 5167-W

Dear Mr. Allen:


On February 7, 2013, I performed a compliance inspection, Sanitary Sewer Overflow (SSO) inspection, and State Industrial No Discharge inspection of the waste water management facilities in accordance with the provisions of the Federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, and the regulations promulgated thereunder. No permit violations were noted during these inspections.

Operation of the treatment plant has greatly improved. With the exception of one violation for phosphorous in July of 2012, the plant is discharging high quality treated effluent which is well below the permit discharge limits.

During this site visit, a Sanitary Sewer Overflow (SSO) inspection was also conducted. A copy of the report is included with this letter. No violations were noted during the State Industrial No Discharge inspection. A copy of this report is also included.

I appreciate the assistance provided to me by Terry Long and Kris Yarnell during this inspection. If you have any questions or would like to discuss this inspection in greater detail, I can be contacted at 870-446-2770 or by e-mail at morris@adeq.state.ar.us.

Sincerely,



Tony L. Morris
District 2 Field Inspector
ADEQ Water Division

 <p style="text-align: center;">UNITED STATES ENVIRONMENTAL PROTECTION AGENCY Washington, D.C. 20460</p> <h2 style="text-align: center;">NPDES Compliance Inspection Report</h2>	Form Approved OMB No. 2040-0003
--	------------------------------------

Section A: National Data System Coding

Transaction Code	NPDES	Yr/Mo/Day	Inspec. Type	Inspector	Fac. Type												
1 N 2 5 3 A R 0 0 2 1 8 6 5 11 1 3 0 2 0 7 17 C 19 S 20 1																	
Remarks																	
<table style="width:100%; border-collapse: collapse;"> <tr> <td style="width:15%;">Inspection Work Days</td> <td style="width:15%;">Facility Evaluation Rating</td> <td style="width:10%;">BI</td> <td style="width:10%;">QA</td> <td style="width:10%; text-align: center;">-----Reserved-----</td> <td style="width:10%;"></td> </tr> <tr> <td>67 0 8 - 0 0 0 3 6 69</td> <td>70 5</td> <td>71 N</td> <td>72 N</td> <td>73 7 4</td> <td>75 8 0</td> </tr> </table>						Inspection Work Days	Facility Evaluation Rating	BI	QA	-----Reserved-----		67 0 8 - 0 0 0 3 6 69	70 5	71 N	72 N	73 7 4	75 8 0
Inspection Work Days	Facility Evaluation Rating	BI	QA	-----Reserved-----													
67 0 8 - 0 0 0 3 6 69	70 5	71 N	72 N	73 7 4	75 8 0												

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) City of Eureka Springs Waste Water Utility 100 Hwy 23 North Eureka Springs, AR 71632 Carroll County	Entry Time/Date 10:50 February 13, 2013	Permit Effective Date March 1, 2013
	Exit Time/Date 14:30 February 13, 2013	Permit Expiration Date February 28, 2018
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Mr. Terry Long/ Plant Operator/ 479-253-7410	Other Facility Data N 36.4196 W 93.7346 PDS# 070097	
Name, Address of Responsible Official/Title/Phone and Fax Number Dwayne Allen/ Public Works Director/ 479-253-9600/ Fax 479-253-6974 City of Eureka Springs 3174 E. Van Buren Eureka Springs, AR 72632	Contacted Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	


Section C: Areas Evaluated During Inspection

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

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

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

- During this inspection the plant discharge was observed to be clear and free of grease and solids.
- Discharge Monitoring Reports for June through December 2012 were reviewed. With the exception of one report in which the phosphorous limit was exceeded, the discharge was well below the permitted limits for these months.
- The Lake Side grit and grease removal unit was operating in the head works.
- The two sequencing batch reactor vessels were observed to be in better condition with less grease visible on the surface during the settling and fill cycles. The small aeration basin prior to sterilization and discharge was observed to be free of floating sludge and grease.

Name(s) and Signature(s) of Inspector(s) Tony L. Morris 	Agency/Office/Telephone/Fax AR Dept. of Environmental Quality- Jasper Field Office 870-446-2770/870-446-2181 (Fax)	Date February 12, 2013
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date

SECTION A: PERMIT VERIFICATION

PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS S M U NA NE

- DETAILS:
- 1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE: Y N NA NE
 - 2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES: Y N NA NE
 - 3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT: Y N NA NE
 - 4. ALL DISCHARGES ARE PERMITTED: Y N NA NE

SECTION B: RECORDKEEPING AND REPORTING EVALUATION

RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT S M U NA NE

- DETAILS:
- 1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS: Y N NA NE
 - 2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE: S M U NA NE
 - a. DATES AND TIME(S) OF SAMPLING: Y N NA NE
 - b. EXACT LOCATION(S) OF SAMPLING: Y N NA NE
 - c. NAME OF INDIVIDUAL PERFORMING SAMPLING: Y N NA NE
 - d. ANALYTICAL METHODS AND TECHNIQUES: Y N NA NE
 - e. RESULTS OF CALIBRATIONS: Y N NA NE
 - f. RESULTS OF ANALYSES: Y N NA NE
 - g. DATES AND TIMES OF ANALYSES: Y N NA NE
 - h. NAME OF PERSON(S) PERFORMING ANALYSES: Y N NA NE
 - 3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE: S M U NA NE
 - 4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR: S M U NA NE
 - 5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA: Y N NA NE

SECTION C: OPERATIONS AND MAINTENANCE

TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED S M U NA NE

- DETAILS:
- 1. TREATMENT UNITS PROPERLY OPERATED: S M U NA NE
 - 2. TREATMENT UNITS PROPERLY MAINTAINED: S M U NA NE
 - 3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED: S M U NA NE
 - 4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE: S M U NA NE
 - 5. ALL NEEDED TREATMENT UNITS IN SERVICE: S M U NA NE
 - 6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED: S M U NA NE
 - 7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED: S M U NA NE
 - 8. OPERATION AND MAINTENANCE MANUAL AVAILABLE: Y N NA NE
 - 9. STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED: Y N NA NE
 - 10. PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED: Y N NA NE
 - 11. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR: Y N NA NE
 - 12. IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED: Y N NA NE
 - 13. HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS: Y N NA NE
 - 14. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT: Y N NA NE
 - 15. IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT: Y N NA NE

SECTION D: SAMPLING

PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS

S M U NA NE

DETAILS:

1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
6. SAMPLE COLLECTION PROCEDURES ADEQUATE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
a. SAMPLES REFRIGERATED DURING COMPOSITING:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
b. PROPER PRESERVATION TECHNIQUES USED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
c. CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
7. IF MONITORING IS PERFORMED MORE OFTEN THAN REQUIRED ARE RESULTS REPORTED ON THE DMR:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE

SECTION E: FLOW MEASUREMENT

PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS

S M U NA NEDETAILS: Flow devices were within acceptable accuracy.

1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: __ TYPE OF DEVICE: <u>9" Parshall Flume</u>	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED: <u>Sonic Device</u>	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
4. CALIBRATION FREQUENCY ADEQUATE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
5. RECORDS MAINTAINED OF CALIBRATION PROCEDURES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
6. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
7. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
8. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
9. HEAD MEASURED AT PROPER LOCATION:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE

SECTION F: LABORATORY

PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS

S M U NA NE

DETAILS:

1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(B) FOR SLUDGES) :	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED:	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE
3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT:	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE
4. QUALITY CONTROL PROCEDURES ADEQUATE:	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE
5. DUPLICATE SAMPLES ARE ANALYZED $\geq 10\%$ OF THE TIME:	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE
6. SPIKED SAMPLES ARE ANALYZED $\geq 10\%$ OF THE TIME:	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE
7. COMMERCIAL LABORATORY USED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
a. LAB NAME: <u>ESC</u>	
b. LAB ADDRESS: <u>1107 Century Springdale, AR 72764</u>	
c. PARAMETERS PERFORMED: <u>CBOD, TSS, NH3-N, Fecal Coliform, Nitrate+Nitrite Nitrogen, Phosphorous</u>	
8. BIOMONITORING PROCEDURES ADEQUATE:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
a. PROPER ORGANISMS USED:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
b. PROPER DILUTION SERIES FOLLOWED:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
c. PROPER TEST METHODS AND DURATION:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
d. RETESTS AND/OR TRE PERFORMED AS REQUIRED:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE

SECTION G: EFFLUENT/RECEIVING WATERS OBSERVATIONS

BASED ON VISUAL OBSERVATIONS ONLY S M U NA NE

DETAILS: Discharge was clear with no persistent foam, sludge or grease.

OUTFALL #:	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	COLOR	OTHER
001	none	none	none	none	none	clear	

SECTION H: SLUDGE DISPOSAL

SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS S M U NA NE

DETAILS: composted with yard waste with backup land application to forage crops

1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY: S M U NA NE
2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503: S M U NA NE
3. FOR LAND APPLIED SLUDGE, TYPE OF LAND APPLIED TO: (E.G., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE): composted, surplus is landfilled

SECTION I: SAMPLING INSPECTION PROCEDURES

SAMPLE RESULTS WITHIN PERMIT REQUIREMENTS S M U NA NE

DETAILS:

1. SAMPLES OBTAINED THIS INSPECTION: Y N NA NE
2. TYPE OF SAMPLE: GRAB:__ COMPOSITE:__ METHOD:__ FREQUENCY:
3. SAMPLES PRESERVED: Y N NA NE
4. FLOW PROPORTIONED SAMPLES OBTAINED: Y N NA NE
5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE: Y N NA NE
6. SAMPLE REPRESENTATIVE OF VOLUME AND NATURE OF DISCHARGE: Y N NA NE
7. SAMPLE SPLIT WITH PERMITTEE: Y N NA NE
8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED: Y N NA NE
9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT: Y N NA NE

SECTION J: STORM WATER POLLUTION PREVENTION PLAN

STORM WATER MANAGEMENT MEETS PERMIT REQUIREMENTS S M U NA NE

DETAILS:

1. SWPPP UPDATED AS NEEDED:__ DATE OF LAST UPDATE: Y N NA NE
2. SITE MAP INCLUDING ALL DISCHARGES AND SURFACE WATERS: Y N NA NE
3. POLLUTION PREVENTION TEAM IDENTIFIED: Y N NA NE
4. POLLUTION PREVENTION TEAM PROPERLY TRAINED: Y N NA NE
5. LIST OF POTENTIAL POLLUTANT SOURCES: Y N NA NE
6. LIST OF POTENTIAL SOURCES AND PAST SPILLS AND LEAKS: Y N NA NE
7. ALL NON-STORM WATER DISCHARGES ARE AUTHORIZED: Y N NA NE
8. LIST OF STRUCTURAL BMPS: Y N NA NE
9. LIST OF NON-STRUCTURAL BMPS: Y N NA NE
10. BMPS PROPERLY OPERATED AND MAINTAINED: Y N NA NE
11. INSPECTIONS CONDUCTED AS REQUIRED: Y N NA NE

FLOW CALCULATION SHEET

Date: **02/07/13** Time: **11:03**

Head in Inches: Feet:

Type & Size of Primary Flow Measurement Device: 9 Inch Parshall Flume

Name & Model of Secondary Flow Measurement Device: Hach Sonic

Date of last Calibration of Secondary Flow Device: October 30, 2012

Recorded Flow at Date & Time Listed Above: (Facility Flow Meter)

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

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

% Error =		-		X 100	

% Error =		X 100	

% Error =		X 100	

% Error =		%	

Comments: **Records of frequent calibration checks confirm the accuracy of flow Measurement.**

DMR Calculation Check

Reporting Period: From 2012 12 01 To 2012 12 31
Year Month Day Year Month Day

Parameter Checked: CBOD

	Loading Mass Mo. Avg. - lbs/day	Concentration Monthly Mo. Avg. - mg/l	7-day Avg. - mg/l
Reported Value:	<u>4.8</u>	<u>2</u>	<u>2</u>
Calculated Value:	<u>4.77</u>	<u>2</u>	<u>2</u>
Permit Value:	<u>75.1</u>	<u>10</u>	<u>15</u>

If calculated value does not equal reported value, explain: Values are equal.

DMR Calculation Check

Reporting Period: From 2012 12 01 To 2012 12 31
Year Month Day Year Month Day

Parameter Checked: TSS

	Loading Mass Mo. Avg. - lbs/day	Concentration Monthly Mo. Avg. - mg/l	7-day Avg. - mg/l
Reported Value:	<u>4.8</u>	<u>2</u>	<u>2</u>
Calculated Value:	<u>4.77</u>	<u>2</u>	<u>2</u>
Permit Value:	<u>112.6</u>	<u>15</u>	<u>22.5</u>

If calculated value does not equal reported value, explain: Values are equal.

Water Division NPDES Photographic Evidence Sheet

Location:	Eureka Springs POTW				
------------------	---------------------	--	--	--	--

Photographer:	Tony Morris	Witness:	Terry Long	
----------------------	-------------	-----------------	------------	--

Photo #	1	Of	6	Date:	02/07/13	Time:	11:17
----------------	---	-----------	---	--------------	----------	--------------	-------

Description:	The Lakeside grit and grease removal unit at the plant head works.				
---------------------	--	--	--	--	--



Photographer:	Tony Morris	Witness:	Terry Long	
----------------------	-------------	-----------------	------------	--

Photo #	2	Of	6	Date:	02/07/13	Time:	11:23
----------------	---	-----------	---	--------------	----------	--------------	-------

Description:	Following primary treatment pH adjustment prior to reactor vessels.				
---------------------	---	--	--	--	--



Water Division NPDES Photographic Evidence Sheet

Location: Eureka Springs POTW

Photographer: Tony Morris **Witness:** Terry Long

Photo # 3 **Of** 6 **Date:** 02/07/13 **Time:** 11:28

Description: Sludge press in operation.



Photographer: Tony Morris **Witness:** Terry Long

Photo # 4 **Of** 6 **Date:** 02/07/13 **Time:** 11:30

Description: Calibration records of secondary flow device with primary flow measuring device.

Date	Reading	Chart	Date	Reading	Chart	Date	Reading	Chart
1			1			1		
2			2			2		
3			3			3		
4			4			4		
5			5			5		
6			6			6		
7			7			7		
8			8			8		
9			9			9		
10			10			10		
11			11			11		
12			12			12		
13			13			13		
14			14			14		
15			15			15		
16			16			16		
17			17			17		
18			18			18		
19			19			19		
20			20			20		
21			21			21		
22			22			22		
23	4.57	4.309	23	4.19	4.00	23		
24			24			24		
25			25			25		
26			26			26		
27	4.65	4.691	27			27		
28	3.50	3.466	28			28		
29			29			29		
30			30			30		
31			31			31		

NOTE: 10% Accuracy is equivalent to 0.5 MGD

Water Division NPDES Photographic Evidence Sheet							
---	--	--	--	--	--	--	--

Location:		Eureka Springs POTW						
Photographer:		Tony Morris			Witness:		Terry Long	
Photo #	5	Of	6	Date:		02/07/13	Time:	11:37
Description:		Reactor vessel in react cycle, much less grease observed on water surface.						



Photographer:		Tony Morris			Witness:		Terry Long	
Photo #	6	Of	6	Date:		02/07/13	Time:	12:01
Description:		Plant discharge of treated effluent to East Leatherwood Creek. Discharge clear with no solids.						

