



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

October 1, 2015

Thomas Myers, Wastewater Superintendent
City of Siloam Springs
P.O. Box 80
Siloam Springs, AR 72761

RE: City of Siloam Springs Inspection
AFIN: 04-00106 Permit No.: AR0020273

Dear Mr. Patterson:

On September 16 and 17, 2015, I performed a Pretreatment Compliance Inspection of the above referenced 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. A copy of the inspection report is enclosed for your records.


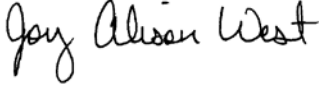
Please refer to the attached inspection report for any comments.

If I can be of any assistance, please contact me at west@adeq.state.ar.us or 479.267.0811, ext. 12.

Sincerely,

A handwritten signature in cursive script that reads "Alison West".

Alison West
District 1 Field Inspector
Water Division

 A R K A N S A S Department of Environmental Quality		WATER DIVISION INSPECTION REPORT				
		AFIN: 04-00106		PERMIT #: AR0020273		DATE: 9/17/2015
		COUNTY: 04 Benton		PDS #: 086914		MEDIA: WN
		GPS LAT: N36.1134 LONG: W-94.3348 LOCATION: General Area				
FACILITY INFORMATION			INSPECTION INFORMATION			
NAME: City of Siloam Springs LOCATION: 975 Anderson Ave. CITY: Siloam Springs			FACILITY TYPE: 1 - Municipal	INSPECTOR ID#: 14939 S - State		
RESPONSIBLE OFFICIAL NAME / TITLE: Thomas Myers / Wastewater Superintendent COMPANY: City of Siloam Springs MAILING ADDRESS: P.O. Box 80 CITY, STATE, ZIP: Siloam Springs AR 72761 PHONE & EXT. / FAX: / EMAIL:			FACILITY EVALUATION RATING: ***		INSPECTION TYPE: Pretreatment Compliance	
			DATE(S): 9/17/2015	ENTRY TIME: 09:30	EXIT TIME: 11:15	PERMIT EFFECTIVE DATE: 10/1/2007
			DATE(S): 9/16/2015	ENTRY TIME: 10:05	EXIT TIME: 15:52	
			PERMIT EXPIRATION DATE: 9/30/2012			
			FAYETTEVILLE SHALE RELATED: N			
			FAYETTEVILLE SHALE VIOLATIONS: N			
			INSPECTION PARTICIPANTS			
			NAME/TITLE/PHONE/FAX/EMAIL/ETC.: Steve Gorszczyk/Water-Wastewater Manager/479.524.5136 (Attending during part of the inspection conducted on 9-16-2015) Tom Myers/Wastewater Superintendent/479.524.5623			
CONTACTED DURING INSPECTION: No						
AREA EVALUATIONS						
(S=Satisfactory, M=Marginal, U=Unsatisfactory, N=Not Applicable/Evaluated)						
**	PERMIT	**	FLOW MEASUREMENT	**	STORMWATER	
**	RECORDS/REPORTS	**	LABORATORY	**	FACILITY SITE REVIEW	
**	OPERATION & MAINTENANCE	**	EFFLUENT/RECEIVING WATER	**	SELF-MONITORING PROGRAM	
**	SAMPLING	**	SLUDGE HANDLING/DISPOSAL	**	PRETREATMENT	
**	OTHER:					
SUMMARY OF FINDINGS						
<p>No violations were noted during the PCI. However, since this inspection the wastewater treatment plant has been upset by a potential industrial user. The upset condition and discharge into the receiving stream has reduced dissolved oxygen levels below 1.0 mg/L at monitoring station ARK0005 and resulted in a fish kill that was reported by the Oklahoma DEQ. The city is currently investigating the cause of the upset condition. An inspection report(s) of the incident is pending.</p>						
GENERAL COMMENTS						
INSPECTOR'S SIGNATURE: 				DATE: 9-28-2015		
SUPERVISOR'S SIGNATURE: ←Click text to left to add signature				DATE:		
-Alison West						
-Supervisor Name						

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

Name of Municipality: **City of Siloam Springs**

AFIN Number: **04-00106**

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

Program Tracked under NPDES Permit Number: **AR0020273**

Fact Sheet Preparation Date: **N/A**

Date of Last PCI/Audit: **December 19, 2011/June 18-20, 2013**

Date of Last Annual Report: **August 24, 2015**

Name of Inspector: **Alison West**

Date PCI Performed: **September 16-17, 2015**

Name, Title, and Telephone Number of Facility Representative:
Steve Gorszczyk, Water/Wastewater Manager, 479.524.5136
(September 16, 2015)

Tom Myers, Wastewater Superintendent, 479.524.5623 (September 16
and 17, 2015)

Name and Title of Other Participants: **NA**

Number of IUs Visited: **2**

Name(s) of IUs Visited: **Gates Rubber Company, Sager Creek Foods,**
Inc.

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

NOTE: ANY QUESTION PRINTED IN ALL CAPS AND BOLD PRINT INDICATED A REGULATORY REQUIREMENT AND MUST BE ANSWERED FOR THE PCI REPORT TO BE COMPLETE. A NO ANSWER TO ONE OF THESE QUESTIONS SHOULD RESULT IN AN UNSATISFACTORY RATING.

A. INDUSTRIAL USER SURVEY

1. List any Significant Industrial Users (SIUs) which have

Inspection Report: **City of Siloam Springs**, AFIN: **04-00106**, Permit #: **AR0020273**
been added or deleted from the program since the last audit
or inspection. **Sager Creek Food, Inc.**

2. Has ADEQ or EPA been notified of these changes? **Yes**

3. **HAS THE INDUSTRIAL USER SURVEY BEEN KEPT UPDATED?** **Yes**

4. What procedures are being used to update the IU Survey?
Review of newspaper/phone book, building permits, new utility connections, Chamber of Commerce, knowledge of City leaders, permit reapplication requirements, onsite inspections, questionnaire and permit information on internet.

5. Total number of Significant Industrial Users, according to the definition used by the POTW. (This number must be greater than or equal to the answer to question 6) **3**

6. Number of Categorical Industrial Users: **1**

7. How does the POTW determine the appropriate categorical standards to apply to an IU? **Federal regulations are researched and appropriate standards are applied. EPA and ADEQ are consulted when assistance is needed.**

8. List all categorical IUs discharging under the approved (such program. Include the name of the IU, the regulatory category as Metal Finishing), and the regulated process (phosphating, zinc plating, etc.) Additional listings can be made in the comments section if necessary.

Name of IU:	Category:	Regulated Process:
<u>Gates Rubber Company</u>	<u>Rubber Manufacturing</u>	<u>Vulcanizers</u>

B. LOCAL LIMITS

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

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

3. How often are pollutant scans of POTW influent, effluent, and sludge performed by the POTW? Does this fulfill the requirements of the approved program (as described in the fact sheet) and part III of the NPDES permit?

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

4. Have there been any inhibitions or upsets at the POTW (since the last PCI of Audit) which were believed to be caused by industrial discharges? If so, describe the action taken by the City to ensure that the incident would not recur. Were these actions effective?
No

C. INDUSTRIAL USER CONTROL MECHANISM

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

2. How many IU permits (or other control documents) have been issued? 4

3. **DO ALL SIGNIFICANT IUS HAVE CURRENT (UNEXPIRED) CONTROL DOCUMENTS? IF NOT, LIST ALL UNPERMITTED SIUS, THE DATE OF EXPIRATION OF THEIR PREVIOUS PERMIT (IF APPLICABLE), AND THE REASON FOR DELAY IN ISSUING THE REQUIRED DOCUMENT.**
Yes

4. Does the control document contain the following items?
An expiration date: Yes

Discharge limitations: Yes

If the program requires self-monitoring by the IUs, do the Permits contain:

IU self-monitoring requirements: Yes

IU reporting requirements: Yes

5. Indicate which of the following recommended standard conditions are contained in the control documents:

Sample location: Yes

Type of sample: Yes

Monitoring frequency: Yes

Bypass prohibition: Yes

Right of entry: Yes

Nontransferability: Yes

Revocation clause: Yes

Penalty Provisions: Yes

Slug load notification: Yes

Notification of process change: Yes

D. MONITORING OF IUS BY POTW

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

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

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

3. Are inspections announced or unannounced? Unannounced

4. Are records kept of each inspection? Yes

5. Does the inspection report contain an adequate description of the following:

Date and time of inspection: Yes

Officials present: Yes

Inspection of chemical storage areas: Yes

Description of regulated processes, categorical waste streams, and discharge location of these waste streams: Yes

Inspection of the pretreatment facilities: NA

Review of self-monitoring records: Yes

Observation of IU self-monitoring procedures: NA

Verification that approved analytical techniques are used: Yes

Verification of IU flow measurement (where required): Yes

6. Overall adequacy of inspection documentation: Satisfactory

7. **DOES THE POTW SAMPLE IUS FOR ALL POLLUTANTS REGULATED IN THEIR PERMITS? (IT IS NOT NECESSARY TO SAMPLE FOR ALL POLLUTANTS EVERY TIME, BUT IT MUST BE DONE PERIODICALLY).**
Yes

8. Are analyses performed in accordance with EPA-approved methods (40 CFR 136)? Yes
9. Are sampling and flow monitoring equipment properly maintained? Contract lab samples industries.
10. Is the POTW keeping proper field notes and chain of custody forms? Yes
11. Is the sampling location representative of the discharge to the collection system? Yes
12. Are sampling locations identified in POTW records? Yes
13. Are sampling services available in an emergency? Yes
14. What are the POTW's procedures for tracking receipt and review of IU reports, such as BMR's, semi-annual reports, progress reports, bypass reports, and self-monitoring reports? Reports are reviewed by the pretreatment compliance officer.
15. **ARE SELF-MONITORING REPORTS REVIEWED TO VERIFY THAT ANALYSES WERE PERFORMED FOR ALL REGULATED PARAMETERS, AND TO EVALUATE COMPLIANCE WITH EFFLUENT LIMITS?** Yes
16. **IF VIOLATIONS ARE FOUND IN REPORTS, DOES THE POTW RESPOND TO ALL VIOLATIONS?** Yes
-
-

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

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

Review a Baseline Monitoring Report from the POTW's file, and indicate which of the following items can be identified in the BMR:

Name and address: N/A

Other environmental permits held: N/A

Description of operations: N/A

Process flow diagrams: N/A

Flow measurements: N/A

Measurements of regulated pollutants: N/A

Certification of compliance by the IU: N/A

Compliance schedule (if needed): N/A

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

E. Enforcement

1. HAS THE POTW IMPLEMENTED ENFORCEMENT RESPONSE PROCEDURES TO ADEQUATELY ADDRESS EVERY IU VIOLATION OF PRETREATMENT STANDARDS AND REQUIREMENTS? Yes, the facility has an enforcement response plan.

2. How does the POTW respond to the following violations?

Effluent limitations: Follows written enforcement response procedures as outlined in the approved program.

Late reports: Follows written enforcement response procedures as outlined in the approved program.

Unpermitted discharges: Follows written enforcement response procedures as outlined in the approved program.

Slug loads or spills: Follows written enforcement response procedures as outlined in the approved program.

3. IS THE LIST OF SIGNIFICANT VIOLATORS PUBLISHED BY THE POTW DEVELOPED IN ACCORDANCE WITH EPA REGION VI CRITERIA FOR SIGNIFICANT VIOLATING INDUSTRIAL USER (DATED AUGUST 22, 1985)? Yes

4. List the SIUs which have met the criteria for Significant Violator within the last 12 months, and describe the enforcement action which has been taken by the POTW. If construction is required, please indicate whether the IU has been placed on an enforceable compliance schedule.

Name:	Type of Violation:	Enforcement Action:	Compliance Deadline:
Simmons Foods	SNC-BOD	Issued new permit, compliance order, more stringent permit, and published in paper.	May 2015

5. Comments on the POTW's enforcement procedures:

Enforcement response procedures appear to be adequate.

F. POTW'S PRETREATMENT ORGANIZATION STRUCTURE

1. Is the program structure essentially the same as that presented in the approved pretreatment program? **Yes**

2. Are staffing levels adequate? **Yes**

3. Are the responsible officials familiar with the approved program? **Yes**

G. MULTIJURISDICTIONAL ISSUES

1. List any IUs which are located outside of the jurisdictional area of the POTW:
Yes-Sager Creek Foods

2. Does the POTW have adequate procedures for controlling IUs located outside its jurisdictional area? **Yes**

3. Does the POTW have copies of permits for IUs in other cities? **N/A**

4. Have any of these IUs met the criteria for Significant Violator? If so, have they been published by the POTW in its annual list of Significant Violators? **No**

5. Comments on multijurisdictional issues: **None**

H. EVALUATION AND COMMENTS

No violations were noted during the PCI. However, since this inspection the wastewater treatment plant has been upset by a potential industrial user. The upset condition and discharge into the receiving stream has reduced dissolved oxygen levels below 1.0 mg/L at monitoring station ARK0005 and resulted in a fish kill that was reported by the Oklahoma DEQ. The city is currently investigating the cause of the upset condition. An inspection report(s) of the incident is pending.

IU SITE VISIT FORM

Name of Industry: **Gates Rubber Company**

POTW Name: **City of Siloam Springs**

Industry Contacts: **Tonya Vaughn, Health, Safety, Environmental Coordinator**

Date and Time of Visit: **9-16-2015/14:54-15:52**

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

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

Categorical Industry? **Yes**

Basis for Limits: **Categorical standards and local ordinance**

Point of Application: **End of discharge pipe**

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

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

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

Name of Industry: **Sager Creek Foods, Inc. (d/b/a Sager Creek Vegetable Company)**

POTW Name: **City of Siloam Springs**

Industry Contacts: **Nathan Florer/Wastewater Manager**

Date and Time of Visit: **9-17-2015/9:29 a.m.-10:59 a.m.**

Description of Manufacturing Process:

SIC No 2032, SIC 2033, NAICS 311421, NAICS 311422

Sources of Process Wastewater:

Washing, peeling, blanching, conveying, soaking, cooking, cooling and other steps in processing vegetables; Cleaning and sanitizing equipment; Boiler blow-down and steam condensate; process aides; boiler treatment chemicals; sanitizing agents are used for cooling water. City has Industrial Waste Discharge Questionnaire for more details regarding sources of process wastewater.

Categorical Industry? **No**

Basis for Limits: **Headwork Loading Rates and Technical Based Local Limits**

Point of Application: **End of discharge pipe**

Description of Pretreatment Equipment and Procedures:

Rotary drum wastewater screens, aerated lagoon system (aerated with brush rotor aerators and a Blue-in-Green oxygenation system, pH control (if necessary), DAF.

Spill Prevention and Solvent Management Procedures:

Facility has a spill prevention and slug control plan.

Sampling Location and Equipment:

Effluent is sampled from pipe off DAF prior to the 20,000 gallon storage tank. Facility uses an ISCO 6712 sampler.
