

# ADEQ

ARKANSAS  
Department of Environmental Quality

December 18, 2017

Butch Berry, Mayor  
City of Eureka Springs  
44 South Main Street  
Eureka Springs, AR 72632

RE: City of Eureka Springs WWTP Inspection  
AFIN: 08-00036 Permit No.: AR0021865

Dear Mr. Berry:

On November 30, 2017, I performed a Compliance Evaluation 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 “Summary of Findings” section of the attached inspection report and provide a written response for each violation that was noted.** This response should be mailed to the attention of the Office of Water Quality Inspection Branch at the address at the bottom of this letter or e-mailed to [Water-Inspection-Report@adeq.state.ar.us](mailto:Water-Inspection-Report@adeq.state.ar.us). This response should contain documentation describing the course of action taken to correct each item noted. This corrective action should be completed as soon as possible, and the written response with all necessary documentation (i.e. photos) is due by **January 5, 2018**.


If I can be of any assistance, please contact me at [grimesg@adeq.state.ar.us](mailto:grimesg@adeq.state.ar.us) or 479.267.0911 ext. 16.

Sincerely,



Garrett Grimes  
District 1 Field Inspector  
Office of Water Quality



Cc: Terry Long, Plant Manager, City of Eureka Springs, 3174 E. Van Buren, Eureka Springs, AR 72632

	<b>OFFICE OF WATER QUALITY INSPECTION REPORT</b>				
	AFIN: 08-00036	PERMIT #: AR0021865	DATE: 11/30/2017		
	COUNTY: 08 Carroll	PDS #: 100586	MEDIA: WN		
	GPS LAT: 36.419674 LONG: -93.734624 LOCATION: Entrance				
<b>FACILITY INFORMATION</b>		<b>INSPECTION INFORMATION</b>			
NAME: <b>City of Eureka Springs WWTP</b> LOCATION: <b>100 Highway 23 North</b> CITY: <b>Eureka Springs, AR</b>		FACILITY TYPE: <b>1 - Municipal</b> INSPECTOR ID#: <b>104111 S - State</b> FACILITY EVALUATION RATING: <b>2 - Marginal</b> INSPECTION TYPE: <b>Compliance Evaluation</b>			
<b>RESPONSIBLE OFFICIAL</b>		DATE(S): <b>11/30/2017</b> ENTRY TIME:      EXIT TIME:      PERMIT EFFECTIVE DATE: <b>3/1/2013</b> PERMIT EXPIRATION DATE: <b>2/28/2018</b>			
NAME / TITLE: <b>Butch Berry / Mayor</b> COMPANY: <b>City of Eureka Springs</b> MAILING ADDRESS: <b>44 South Main Street</b> CITY, STATE, ZIP: <b>Eureka Springs AR 72632</b> PHONE & EXT. / FAX: <b>/</b> EMAIL:		FAYETTEVILLE SHALE RELATED: <b>N</b> FAYETTEVILLE SHALE VIOLATIONS: <b>N</b>			
CONTACTED DURING INSPECTION: <b>No</b>		<b>INSPECTION PARTICIPANTS</b>			
		NAME/TITLE/PHONE/FAX/EMAIL/ETC.: <b>Terry Long/Plant Manager/Class IV Operator/479-981-0707</b>			
<b>AREA EVALUATIONS</b> (S=Satisfactory, M=Marginal, U=Unsatisfactory, N=Not Applicable/Evaluated)					
<b>S</b>	PERMIT	<b>S</b>	FLOW MEASUREMENT	<b>**</b>	STORMWATER
<b>M</b>	RECORDS/REPORTS	<b>S</b>	LABORATORY	<b>**</b>	FACILITY SITE REVIEW
<b>U</b>	OPERATION & MAINTENANCE	<b>S</b>	EFFLUENT/RECEIVING WATER	<b>**</b>	SELF-MONITORING PROGRAM
<b>U</b>	SAMPLING	<b>S</b>	SLUDGE HANDLING/DISPOSAL	<b>**</b>	PRETREATMENT
<b>**</b>	OTHER:				
<b>SUMMARY OF FINDINGS</b>					
The following violations were noted during the inspection:					
1) Improper operation and maintenance. These violate part III, Section B.1.A of the permit.					
a. Excess amounts of grit and scum were observed in the SBR tanks (Photos #1 - #3, Attachment 1). Terry Long, Plant Manager, stated that the sludge and grit was attributed to oil and grease build-up, a lack of manpower, and to the non-functional Lakeside unit. According to Mr. Long, additional help has been recently hired for the treatment plant and the activation of the unit should result in a significant decrease in the amount grit in the SBR. Mr. Allen stated that an ordinance is in place for commercial users with grease traps and that grease generators are inspected by a building inspector, but grease remains an issue.					
b. The Lakeside Grit Removal System was offline and influent was being bypassed to a secondary bar screen (Photos #4 - #6, Attachment 1). Mr. Long stated this was partly responsible for the excess grit in the SBR. Dwayne Allen, PW Director, City of Eureka Springs, stated in a December 12, 2017, telephone conversation that the Lakeside system failed after a flood event in the Spring of 2017, and a new unit was installed in the Fall of 2017. According to Mr. Allen, the Lakeside system needs to be tested by representatives of the company before reactivation and gave a timetable for reactivation by January 8, 2018.					
c. Mr. Long stated that by design the UV system located at the facility can adequately treat wastewater effluent as long as 50% of the bulbs are operational. Over 50% of the UV bulbs in the UV treatment system appeared to be either burned out or raised above the water due to faulty seals (Photos #7 - #8). Mr. Long stated that spare UV bulbs are not kept on hand and only ordered as needed.					
d. pH 7 Buffer packets used for calibration were expired at the time of the inspection.					

- 2) **Mr. Long stated that maintaining the equipment was difficult due to a lack of personnel at the Wastewater Treatment Facility which contributed some of the above noted operation and maintenance issues. Mr. Long stated that a technician was recently hired to assist in plant operations. However, Mr. Allen stated that several important vacancies still exist due to qualified personnel leaving the facility, and that the city was having difficulty attracting qualified applicants. The City of Eureka Springs is required by Part III, Section B.1.B of the permit to maintain an adequate, qualified staff to carry out operation, maintenance, and testing functions in order to maintain compliance with the permit.**
- 3) **Measurements of pH are taken from the SBR Tanks instead of after final treatment, according to Mr. Long. This is a violation of Part III, Section C.1 of the permit.**
- 4) **The City of Eureka Springs' Wastewater Treatment Plant is required to measure pH and Dissolved Oxygen three times per month. However, records indicate that these parameters are sampled at a higher frequency (Attachment 2). While it also appears that these samples are being factored into monthly Discharge Monitoring Report (DMR) calculations, the frequency is still being reported as three times per month (Attachment 3). These are violations of Part III, Section C.6 of the permit.**
- 5) **Mr. Long stated the Dissolved Oxygen and pH meters are calibrated at the facility before use, and provided previously completed calibration forms (Photos #9 - #10). However, Mr. Long stated that the facility no longer completes and maintains calibration records for this equipment. This is a violation of Part III, Section C.7 of the permit.**

**GENERAL COMMENTS**

- By design the SBR system does not discharge continually, but decants several times a day. No discharge was observed at the time of the inspection. However, ADEQ did examine the outfall and adjacent areas of Leatherwood Creek and did not identify any visual signs of previous water quality violations (i.e. increased algal growth or sludge, grit, and grease deposits) (Photos #11 - #12, Attachment 1). In order to verify the calibration of the facility's flow meter, Mr. Long uses a 7.5" brick which he places in the flume below the totalizer. The meter appeared to be calibrated within a 10% range of error using this method during the inspection. However, the staff gauge attached to the Parshall Flume was worn and unreadable and no other staff gauges were located on-site. The City of Eureka Springs should replace or keep a staff gauge on-site.
- Sludge from the SBR is pumped to a former secondary clarifier where it is allowed to thicken before being pumped to the sludge press building (Photos #13 - #14, Attachment 1). Mr. Long stated the majority of the sludge is sent to a landfill, but some Class A sludge is retained by the City of Eureka Springs for generating compost which is given to residents for gardening purposes. Mr. Long was able to provide February 25, 2017, sample results verifying the sludge as Class A for land application (Attachment 4).
- Mr. Long stated that he collects the composite samples and stores them in a refrigerator in the on-site lab. A thermometer was kept in the refrigerator to verify proper sample preservation temperature at the time of the inspection (Photo #15).
- An operation and maintenance manual and standard operating procedures have not been developed for the facility, according to Mr. Long. Furthermore, an inventory list of spare parts and equipment and maintenance log are not maintained. The City of Eureka Springs should consider developing and maintaining these documents to ensure efficient operation of the facility and the ability to quickly respond to maintenance issues.
- A potable water pipe was observed leaking in the UV Treatment Building and untreated effluent from leaking pumps was observed draining on the floor in the SBR Tank Pump Room (Photos #16 - #17). The City of Eureka Springs should repair these leaks in order prevent potable water from entering the system and potential contamination of the surrounding area by untreated wastewater.
- A major flood occurred in the Spring of 2017 causing wastewater to overflow throughout the plant, according to Mr. Long and Mr. Allen. Evidence of the flood including what appeared to be solids deposited on the floor of the SBR Pump Building was observed during the inspection (Photos #18). The City of Eureka Springs should consider a clean-up of this building to ensure residuals from untreated effluent are not tracked off-site.

INSPECTOR'S SIGNATURE: 	Garrett Grimes	DATE: 12/14/2017
SUPERVISOR'S SIGNATURE: 	Jason Bolenbaugh	DATE: 12/15/2017



<b>SECTION A: PERMIT VERIFICATION</b>	
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
DETAILS:	
1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE:	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
4. ALL DISCHARGES ARE PERMITTED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
<b>SECTION B: RECORDKEEPING AND REPORTING EVALUATION</b>	
RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT	<input type="checkbox"/> S <input checked="" type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
DETAILS:	
1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS: <u>Slight difference in calculated vs. reported NH3-N for April 2015.</u>	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE:	<input type="checkbox"/> S <input checked="" type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
a. DATES AND TIME(S) OF SAMPLING:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
b. EXACT LOCATION(S) OF SAMPLING:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
c. NAME OF INDIVIDUAL PERFORMING SAMPLING:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
d. ANALYTICAL METHODS AND TECHNIQUES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
e. RESULTS OF CALIBRATIONS: <u>See below</u>	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
f. RESULTS OF ANALYSES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
g. DATES AND TIMES OF ANALYSES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
h. NAME OF PERSON(S) PERFORMING ANALYSES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE: <u>Records for DO and pH not maintained</u>	<input type="checkbox"/> S <input type="checkbox"/> M <input checked="" type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR:	<input type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
<b>SECTION C: OPERATIONS AND MAINTENANCE</b>	
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED	<input type="checkbox"/> S <input type="checkbox"/> M <input checked="" type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
DETAILS:	
1. TREATMENT UNITS PROPERLY OPERATED:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
2. TREATMENT UNITS PROPERLY MAINTAINED: <u>Grit and large amounts of scum in the Aeration Basins.</u>	<input type="checkbox"/> S <input type="checkbox"/> M <input checked="" type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE: <u>SCADA</u>	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
5. ALL NEEDED TREATMENT UNITS IN SERVICE: <u>Lakeside grit removal system still inoperable.</u>	<input type="checkbox"/> S <input type="checkbox"/> M <input checked="" type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED: <u>Terry Long (Class IV)</u>	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED: <u>Order as needed.</u>	<input type="checkbox"/> S <input checked="" type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE: <u>None available.</u>	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
9. STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED: <u>None established</u>	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
10. PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
11. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
12. IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED: <u>SSOs reported on April and August, 2017.</u>	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
13. HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
14. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT:	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
15. IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE

<b>SECTION D: SAMPLING</b>	
<b>PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS</b>	<input type="checkbox"/> S <input type="checkbox"/> M <input checked="" type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
<b>DETAILS:</b>	
1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT: <u>pH samples taken out of aeration basins.</u>	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES: <u>Other samples taken out of effluent flume.</u>	<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: <u>See above.</u>	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
a. SAMPLES REFRIGERATED DURING COMPOSITING: <u>Samples manually collected for composite and kept in a refrigerator.</u>	<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: <u>Additional monitoring results (i.e. pH and DO) are used in calculations. However, the frequency is not reported.</u>	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
<b>SECTION E: FLOW MEASUREMENT</b>	
<b>PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS</b>	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
<b>DETAILS:</b>	
1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: <u>9"</u> TYPE OF DEVICE: <u>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:	<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 type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" 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
<b>SECTION F: LABORATORY</b>	
<b>PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS</b>	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
<b>DETAILS:</b>	
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 checked="" type="checkbox"/> NA <input type="checkbox"/> NE
3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
4. QUALITY CONTROL PROCEDURES ADEQUATE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
5. DUPLICATE SAMPLES ARE ANALYZED $\geq$ 10% OF THE TIME:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
6. SPIKED SAMPLES ARE ANALYZED $\geq$ 10% OF THE TIME:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input 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>Environmental Services Company, Inc.</u>	
b. LAB ADDRESS: <u>1107 Century Avenue, Springdale, AR 72762</u>	
c. PARAMETERS PERFORMED: <u>FCB, CBOD, TP, NH3-N, NO2-NO3</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

<b>SECTION G: EFFLUENT/RECEIVING WATERS OBSERVATIONS</b>							
<b>BASED ON VISUAL OBSERVATIONS ONLY</b>						<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE	
<b>DETAILS: <u>No flow during inspection. Area around outfall examined with no visual evidence of water quality issues identified.</u></b>							
OUTFALL #:	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	COLOR	OTHER
001	NA	NA	NA	NA	NA	NA	--

<b>SECTION H: SLUDGE DISPOSAL</b>	
<b>SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS</b>	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
<b>DETAILS:</b>	
1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
3. FOR LAND APPLIED SLUDGE, TYPE OF LAND APPLIED TO: (E.G., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE): <u>Class A sludge used for compost by the City of Eureka Springs.</u>	

<b>SECTION I: SAMPLING INSPECTION PROCEDURES</b>	
<b>SAMPLE RESULTS WITHIN PERMIT REQUIREMENTS</b>	<input type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
<b>DETAILS:</b>	
1. SAMPLES OBTAINED THIS INSPECTION:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
2. TYPE OF SAMPLE: <input type="checkbox"/> GRAB:___ <input type="checkbox"/> COMPOSITE:___ METHOD:___ FREQUENCY:___	
3. SAMPLES PRESERVED:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
4. FLOW PROPORTIONED SAMPLES OBTAINED:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
6. SAMPLE REPRESENTATIVE OF VOLUME AND NATURE OF DISCHARGE:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
7. SAMPLE SPLIT WITH PERMITTEE:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE

<b>SECTION J: STORM WATER POLLUTION PREVENTION PLAN</b>	
<b>STORM WATER MANAGEMENT MEETS PERMIT REQUIREMENTS</b>	<input type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
<b>DETAILS:</b>	
1. SWPPP UPDATED AS NEEDED:___ DATE OF LAST UPDATE:___	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
2. SITE MAP INCLUDING ALL DISCHARGES AND SURFACE WATERS:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
3. POLLUTION PREVENTION TEAM IDENTIFIED:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
4. POLLUTION PREVENTION TEAM PROPERLY TRAINED:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
5. LIST OF POTENTIAL POLLUTANT SOURCES:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
6. LIST OF POTENTIAL SOURCES AND PAST SPILLS AND LEAKS:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
7. ALL NON-STORM WATER DISCHARGES ARE AUTHORIZED:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
8. LIST OF STRUCTURAL BMPS:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
9. LIST OF NON-STRUCTURAL BMPS:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
10. BMPS PROPERLY OPERATED AND MAINTAINED:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
11. INSPECTIONS CONDUCTED AS REQUIRED:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE

**FLOW CALCULATION SHEET**

Date: **11/30/2017** Time: **12:36**

Head in Inches: **NA** Feet: **NA** **No flow during the Inspection. See Comments**

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

Name & Model of Secondary Flow Measurement Device: **Hach Sigma 980**

Date of last Calibration of Secondary Flow Device: **8-16-2017**

Recorded Flow at Date & Time Listed Above: **0.96 MGD** (Facility Flow Meter)

Calculated Flow at Date & Time Listed Above: **0.99 MGD**

(Flow is calculated using flow charts in: ISCO Open Channel Flow Measurement Handbook-5<sup>th</sup> Edition)

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

% Error =	0.96 MGD	-	0.99 MGD	X 100
	0.99 MGD			

% Error =	-0.03	X 100
	0.99	

% Error =	-0.03	X 100
-----------	-------	-------

% Error =	<b>3</b>	%
-----------	----------	---

Comments: **The facility uses a 7.5" cinder block to check the flow meter during periods of no-flow.**

**DMR Calculation Check**

Reporting Period: From 2017 10 01 To 2017 10 31  
 Year Month Day Year Month Day

Parameter Checked: Total Phosphorus

	<b>Loading Mass</b>	<b>Concentration</b>	
	<b>Mo. Avg. - lbs/day</b>	<b>Mo. Avg. - mg/l</b>	<b>7-day Avg. - mg/l</b>
Reported Value:	<u>1.2</u>	<u>0.4</u>	<u>1.0</u>
Calculated Value:	<u>1.2</u>	<u>0.4</u>	<u>1.0</u>
Permit Value:	<u>7.5</u>	<u>1.0</u>	<u>2.0</u>

If calculated value does not equal reported value, explain:

**DMR Calculation Check**

Reporting Period: From 2015 04 01 To 2015 04 30  
 Year Month Day Year Month Day

Parameter Checked: NH3-N

	Loading Mass Mo. Avg. - lbs/day	Concentration Monthly	
		Mo. Avg. - mg/l	7-day Avg. - mg/l
Reported Value:	<u>13.6</u>	<u>4.6</u>	<u>7.3</u>
Calculated Value:	<u>13.5</u>	<u>4.5</u>	<u>7.3</u>
Permit Value:	<u>29.3</u>	<u>3.9</u>	<u>3.9</u>

If calculated value does not equal reported value, explain:

Slight difference in calculated vs. reported. No clear reason for difference.

**Office of Water Quality Photographic Evidence Sheet**

Location:	<b>City of Eureka Springs WWTP</b>			
Photographer:	<b>Garrett Grimes, District 1 Inspector</b>	Date:	<b>11/30/2017</b>	
Witness:	<b>Ankush Nautiyal, District 1 Inspector</b>	Time:	<b>12:07</b>	
Description:	<b>Inflow in SBR Tanks. Grit was observed floating in this location.</b>		Photo #:	<b>1</b>



Photographer:	<b>Garrett Grimes, District 1 Inspector</b>	Date:	<b>11/30/2017</b>	
Witness:	<b>Ankush Nautiyal, District 1 Inspector</b>	Time:	<b>12:06</b>	
Description:	<b>Scum on the surface of the SBR Tanks.</b>		Photo #:	<b>2</b>





**Office of Water Quality Photographic Evidence Sheet**

Location:	<b>City of Eureka Springs WWTP</b>		
Photographer:	<b>Garrett Grimes, District 1 Inspector</b>	Date:	<b>11/30/2017</b>
Witness:	<b>Ankush Nautiyal, District 1 Inspector</b>	Time:	<b>12:06</b>
		Photo #:	<b>3</b>
Description:	<b>Continued from Photo #2.</b>		



Photographer:	<b>Garrett Grimes, District 1 Inspector</b>	Date:	<b>11/30/2017</b>
Witness:	<b>Ankush Nautiyal, District 1 Inspector</b>	Time:	<b>11:53</b>
		Photo #:	<b>4</b>
Description:	<b>Non-functional Lakeside Grit Removal System.</b>		





**Office of Water Quality Photographic Evidence Sheet**

Location:	<b>City of Eureka Springs WWTP</b>			
Photographer:	<b>Garrett Grimes, District 1 Inspector</b>	Date:	<b>11/30/2017</b>	
Witness:	<b>Ankush Nautiyal, District 1 Inspector</b>	Time:	<b>11:56</b>	
Description:	<b>Continued from Photo #4.</b>		Photo #:	<b>5</b>



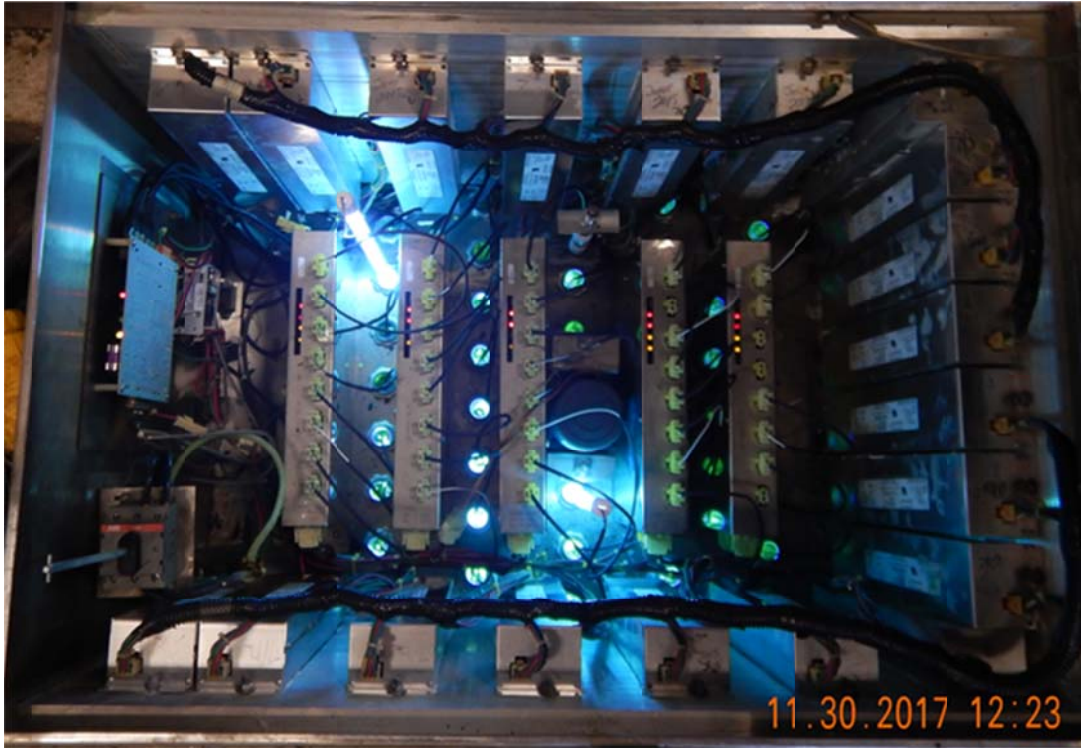
Photographer:	<b>Garrett Grimes, District 1 Inspector</b>	Date:	<b>11/30/2017</b>	
Witness:	<b>Ankush Nautiyal, District 1 Inspector</b>	Time:	<b>12:00</b>	
Description:	<b>Bar screen used for grit removal.</b>		Photo #:	<b>6</b>



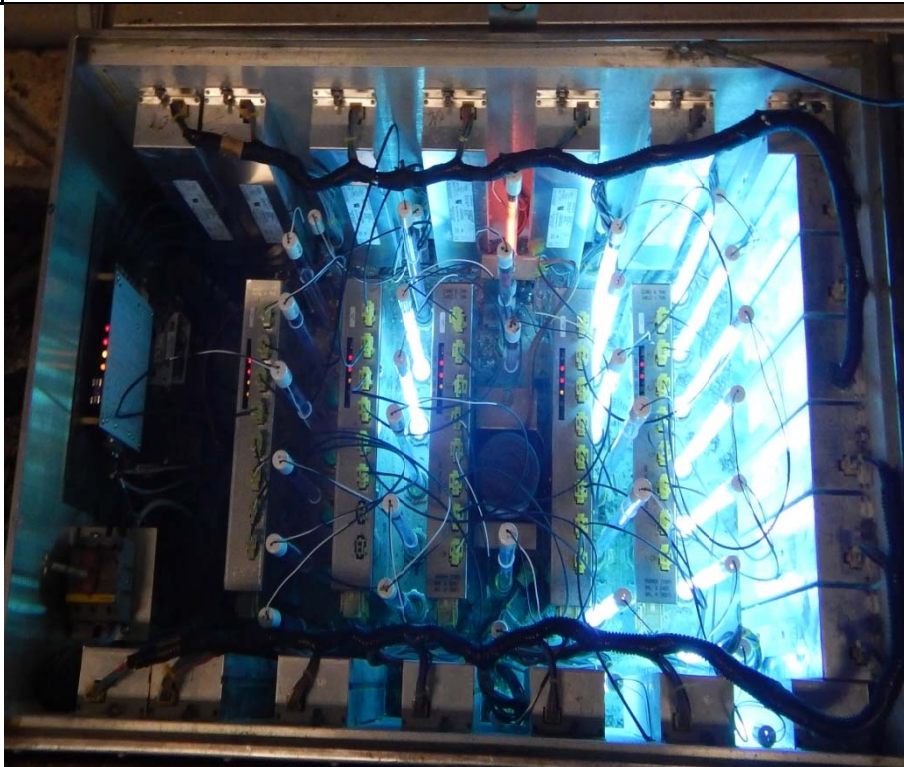


**Office of Water Quality Photographic Evidence Sheet**

Location:	<b>City of Eureka Springs WWTP</b>		
Photographer:	<b>Garrett Grimes, District 1 Inspector</b>	Date:	<b>11/30/2017</b>
Witness:	<b>Ankush Nautiyal, District 1 Inspector</b>	Time:	<b>12:23</b>
Description:	<b>A Chamber of the UV treatment system. Several bulbs are raised out of the water.</b>		



Photographer:	<b>Garrett Grimes, District 1 Inspector</b>	Date:	<b>11/30/2017</b>
Witness:	<b>Ankush Nautiyal, District 1 Inspector</b>	Time:	<b>12:25</b>
Description:	<b>Another chamber of the UV treatment system showing burned out bulbs and bulbs raised out of the water due to leaks.</b>		



Office of Water Quality Photographic Evidence Sheet

Location:	City of Eureka Springs WWTP		
Photographer:	Garrett Grimes, District 1 Inspector	Date:	11/30/2017
Witness:	Ankush Nautiyal, District 1 Inspector	Time:	13:48
		Photo #:	9
Description:	Calibration form for the Dissolved Oxygen Meter dated 2014.		

**Eureka Springs Wastewater Treatment Facility**  
Dissolved Oxygen Calibration Sheet

DATE	TIME	INIT	CAL. VALUE	DATE	TIME	INIT	CAL. VALUE
1-8-14	1145	72	99%				
1-15-14	1150	72	100%				
1-22-14	1215	72	100%				
1-28-14	1210	72	101%				
1-30-14	1200	72	102%				
2-5-14	1310	72	100%				
2-12-14	1310	72	100%				
2-17-14	1455	72	100%				

Photographer:	Garrett Grimes, District 1 Inspector	Date:	11/30/2017	Time:	13:48
Witness:	Ankush Nautiyal, District 1 Inspector	Photo #:	10		
Description:	Calibration form for the pH Meter dated 2014.				

**Eureka Springs Wastewater Treatment Facility**  
pH Calibration Sheet

DATE	INIT	TIME	TEMP	4.0 BUFFER	7.0 BUFFER	10.0 BUFFER
1-2-14	TC	0715	72°	4.00	7.01	10.03
1-10-14	TC	0720	72°	4.01	6.99	10.01
1-13-14	TC	0720	72°	3.98	6.99	10.00
1-21-14	TC	0800	72°	3.99	7.00	10.00
1-27-14	TC	0805	71°	4.00	7.03	9.98
2-3-14	TC	0815	71°	4.01	7.02	9.99
2-10-14	TC	0745	72°	4.02	7.03	9.99
2-17-14	TC	0750	72°	3.99	6.99	10.00



**Office of Water Quality Photographic Evidence Sheet**

Location:	<b>City of Eureka Springs WWTP</b>		
Photographer:	<b>Garrett Grimes, District 1 Inspector</b>	Date:	<b>11/30/2017</b>
Witness:	<b>Ankush Nautiyal, District 1 Inspector</b>	Time:	<b>12:53</b>
		Photo #:	<b>11</b>
Description:	<b>Leatherwood Creek near the outfall.</b>		



Photographer:	<b>Garrett Grimes, District 1 Inspector</b>	Date:	<b>11/30/2017</b>
Witness:	<b>Ankush Nautiyal, District 1 Inspector</b>	Time:	<b>14:00</b>
		Photo #:	<b>12</b>
Description:	<b>Leatherwood Creek downstream of the outfall.</b>		





**Office of Water Quality Photographic Evidence Sheet**

Location:	<b>City of Eureka Springs WWTP</b>		
Photographer:	<b>Garrett Grimes, District 1 Inspector</b>	Date:	<b>11/30/2017</b>
Witness:	<b>Ankush Nautiyal, District 1 Inspector</b>	Time:	<b>12:39</b>
		Photo #:	<b>13</b>
Description:	<b>Sludge thickening in the former secondary clarifier.</b>		

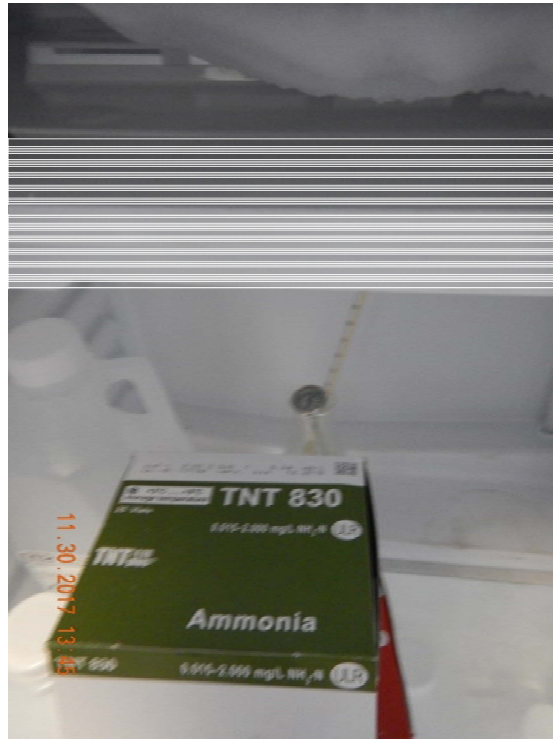


Photographer:	<b>Garrett Grimes, District 1 Inspector</b>	Date:	<b>11/30/2017</b>
Witness:	<b>Ankush Nautiyal, District 1 Inspector</b>	Time:	<b>12:45</b>
		Photo #:	<b>14</b>
Description:	<b>Conveyer in the sludge press building.</b>		



**Office of Water Quality Photographic Evidence Sheet**

Location:	<b>City of Eureka Springs WWTP</b>		
Photographer:	<b>Garrett Grimes, District 1 Inspector</b>	Date:	<b>11/30/2017</b>
Witness:	<b>Ankush Nautiyal, District 1 Inspector</b>	Time:	<b>13:45</b>
		Photo #:	<b>15</b>
Description:	<b>Thermometer showing the refrigerator used to store composite samples is operating at the proper temperature.</b>		



Photographer:	<b>Garrett Grimes, District 1 Inspector</b>	Date:	<b>11/30/2017</b>
Witness:	<b>Ankush Nautiyal, District 1 Inspector</b>	Time:	<b>12:59</b>
		Photo #:	<b>16</b>
Description:	<b>Leaking pumps in the SBR Pump Building.</b>		





**Office of Water Quality Photographic Evidence Sheet**

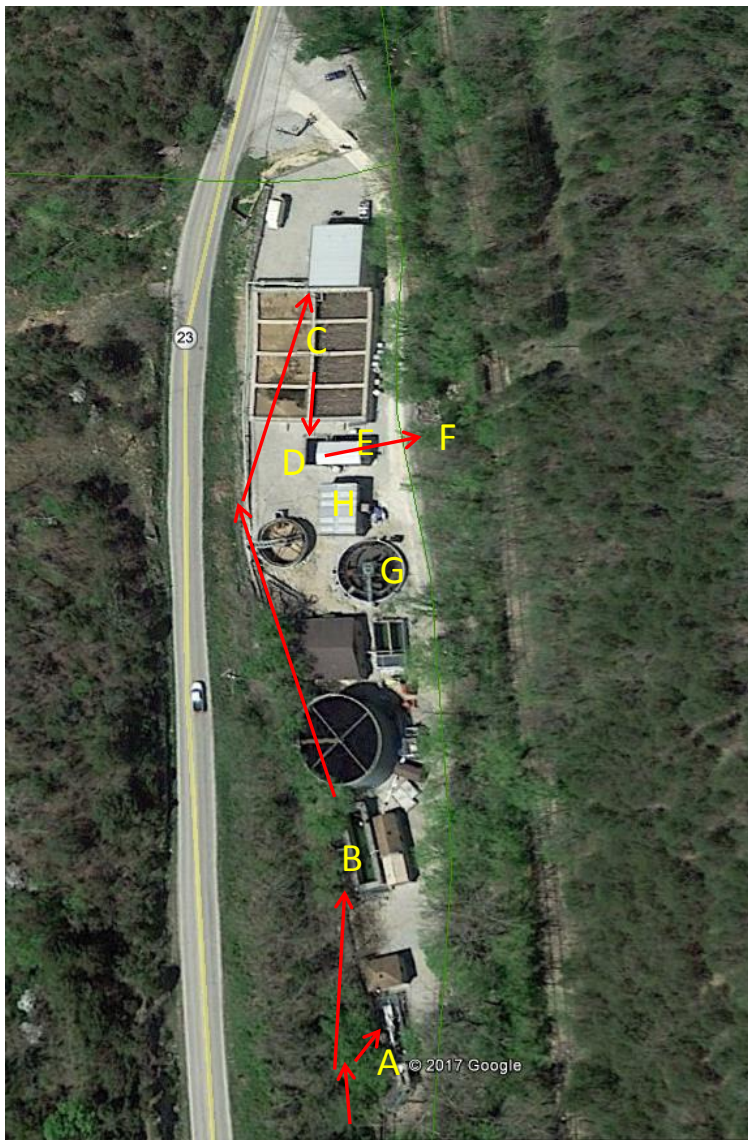
Location:	<b>City of Eureka Springs WWTP</b>		
Photographer:	<b>Garrett Grimes, District 1 Inspector</b>	Date:	<b>11/30/2017</b>
Witness:	<b>Ankush Nautiyal, District 1 Inspector</b>	Time:	<b>13:03</b>
Description:	<b>Continued from photo #16.</b>		



Photographer:	<b>Garrett Grimes, District 1 Inspector</b>	Date:	<b>11/30/2017</b>
Witness:	<b>Ankush Nautiyal, District 1 Inspector</b>	Time:	<b>12:59</b>
Description:	<b>Inside of the SBR building showing evidence of a flood event on the floor.</b>		



Attachment 1: Map showing the layout of the facility and path of wastewater treatment.



- A. Lakeside System
- B. Bar Screen
- C. SBR Tanks
- D. Post Aeration Tank
- E. UV Treatment Building
- F. Outfall
- G. Sludge Thickening
- H. Sludge Press Building

(Red arrows show path of wastewater through the plant.)



<b>APRIL 2015</b>				
DATE	METER READIN G	DAILY FLOW (MGD)	D. O.	pH
1	182016	0.393	6.8	8.54
2	182409	0.345	-	8.65
3	182754	0.376	-	8.66
4	183130	0.342	-	-
5	183472	0.313	-	-
6	183785	0.387	6.7	8.76
7	184172	0.265	-	-
8	184437	0.310	-	-
9	184747	0.281	-	-
10	185028	0.368	6.8	8.61
11	185396	0.366	-	-
12	185762	0.326	-	-
13	186088	0.341	-	8.63
14	186429	0.298	-	8.67
15	186727	0.366	6.7	8.75
16	187093	0.334	-	8.82
17	187427	0.381	-	8.73
18	187808	0.414	-	-
19	188222	0.374	-	-
20	188596	0.292	-	8.71
21	188888	0.259	-	8.64
22	189147	0.344	6.6	8.43
23	189491	0.317	-	8.48
24	189808	0.392	-	8.47
25	190200	0.378	-	-
26	190578	0.317	-	-
27	190895	0.364	-	8.52
28	191259	0.285	-	8.50
29	191544	0.304	-	8.44
30	191848	0.341	6.7	8.47
31	192189			-

<b>DECEMBER 2016</b>				
DATE	METER READIN G	DAILY FLOW (MGD)	D. O.	pH
1	455303	0.298	6.70	6.71
2	455601	0.339	-	6.55
3	455940	0.309	-	-
4	456249	0.331	-	-
5	456580	0.303	-	6.43
6	456883	0.237	6.68	6.56
7	457120	0.271	-	6.53
8	457391	0.241	6.72	6.64
9	457632	0.299	-	6.54
10	457931	0.265	-	-
11	458196	0.281	-	-
12	458477	0.326	6.75	6.61
13	458803	0.268	-	6.68
14	459071	0.229	-	6.70
15	459300	0.270	-	-
16	459570	0.287	-	-
17	459857	0.271	-	-
18	460128	0.289	-	-
19	460417	0.298	6.80	6.72
20	460715	0.326	-	-
21	461041	0.319	-	6.71
22	461360	0.333	6.78	6.71
23	461693	0.282	-	-
24	461975	0.267	-	-
25	462242	0.298	-	-
26	462540	0.404	-	-
27	462944	0.307	-	6.78
28	463251	0.318	-	-
29	463569	0.343	6.80	6.75
30	463912	0.359	-	-
31	464271	0.353	-	-

464624

<b>OCTOBER 2017</b>				
DATE	METER READIN G	DAILY FLOW (MGD)	D. O.	pH
1	589237	0.372	-	-
2	589609	0.343	-	-
3	589952	0.418	7.05	7.14
4	590370	0.322	-	7.16
5	590692	0.412	-	-
6	591104	0.466	-	-
7	591570	0.458	-	-
8	592028	0.402	-	-
9	592430	0.347	-	-
10	592777	0.364	-	-
11	593141	0.401	-	-
12	593542	0.413	7.10	7.07
13	593955	0.438	7.00	7.12
14	594393	0.451	-	-
15	594844	0.538	-	-
16	595382	0.344	7.20	7.05
17	595726	0.349	-	-
18	596075	0.395	6.95	7.08
19	596470	0.426	-	-
20	596896	0.464	7.30	7.09
21	597360	0.539	-	-
22	597899	0.731	-	-
23	598630	0.392	-	-
24	599022	0.381	-	-
25	599403	0.366	7.20	7.12
26	599769	0.356	-	-
27	600125	0.430	7.25	7.10
28	600555	0.476	-	-
29	601031	0.428	-	-
30	601459	0.403	-	-
31	601862	0.318	-	-

602180

Form Approved  
OMB No. 2040-0004

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)  
DISCHARGE MONITORING REPORT (DMR)

PERMITTEE NAME/ADDRESS (include Facility Name/Location if Different)  
 NAME: EUREKA SPRINGS, CITY OF-C/O ENVIRONMENTAL  
 ADDRESS: 1107 CENTURY SPRINGDALE, AR 72764  
 FACILITY: EUREKA SPRINGS, CITY OF  
 LOCATION: 100 HIGHWAY 23 NORTH  
 EUREKA SPRINGS, AR 72632

DMR Mailing ZIP CODE: 72764  
 MINOR \$  
 001-MONTHLY-TRTD MUNICIPAL WW  
 External Outfall  
 No Discharge

AR0021865 PERMIT NUMBER	001-A DISCHARGE NUMBER
MM/DD/YYYY 04/01/2015	MM/DD/YYYY 04/30/2015

ATTN: DWAYNE ALLEN, PUBLIC WORKS DIR

PARAMETER	QUANTITY OR LOADING		QUALITY OR CONCENTRATION		NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE
	VALUE	UNITS	VALUE	UNITS			
Oxygen, dissolved [DO]	*****	*****	6.6	*****	0	3 mo	GRAB
00300 10 Effluent Gross	*****	*****	6.5 INST MIN	*****	0	Three per Month	GRAB
pH	*****	*****	8.4	*****	0	3 mo	GRAB
00400 10 Effluent Gross	*****	*****	6 MINIMUM	*****	0	Three per Month	GRAB
Solids, total suspended	*****	*****	*****	*****	0	3 mo	COMPOS
00530 10 Effluent Gross	112.6 MO AVG	lb/d	< 2.0 MO AVG	15	0	Three per Month	COMPOS
Nitrogen, ammonia total [as N]	13.6 MO AVG	lb/d	4.6 MO AVG	3.9	2	3 mo	COMPOS
00610 12 Effluent Gross	29.3 MO AVG	lb/d	3.9 MO AVG	7 DA AVG	0	Three per Month	COMPOS
Nitrite + Nitrate total [as N]	6.1 MO AVG	lb/d	*****	*****	0	3 mo	COMPOS
00630 10 Effluent Gross	75.1 MO AVG	lb/d	*****	*****	0	Three per Month	COMPOS
Phosphorus, total [as P]	4.3 MO AVG	lb/d	*****	*****	0	3 mo	COMPOS
00665 10 Effluent Gross	7.5 MO AVG	lb/d	*****	*****	0	12 per Month	COMPOS
Flow, in conduit or thru treatment plant	13392 MO AVG	MGD	*****	*****	0	Daily	TOTALZ
50050 10 Effluent Gross	Req. Mon. MO AVG	MGD	*****	*****	0	Daily	TOTALZ

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER <i>Dwaine Allen</i>	SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT <i>Dwaine Allen</i>	TELEPHONE	DATE
TYPED OR PRINTED	479-253-7100	AREA Code	MM/DD/YYYY
			05/12/2015

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

Report flow as monthly average & daily maximum in million gallons per day. (S) Use Overflows (74062) to report total number of SSOs/Month. Use Overflow volume (74063) to report total volume of SSOs in gallons/month. Report "0" (zero), if no overflows during the entire month. See Part II. 5. (SSO). 08-00036

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and report the information and that the information gathered and reported is true and accurate. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Form Approved  
OMB No. 2040-0004

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)  
DISCHARGE MONITORING REPORT (DMR)

PERMITTEE NAME/ADDRESS (Include Facility Name/Location if Different)  
NAME: EUREKA SPRINGS, CITY OF-C/O ENVIRONMEN  
ADDRESS: 1107 CENTURY  
SPRINGDALE, AR 72764  
FACILITY: EUREKA SPRINGS, CITY OF  
LOCATION: 100 HIGHWAY 23 NORTH  
EUREKA SPRINGS, AR 72632

DMR Mailing ZIP CODE: 72764  
MINOR \$  
001-MONTHLY-TRTD MUNICIPAL VWW  
External Outfall  
No Discharge

AR0021865 PERMIT NUMBER	001-A DISCHARGE NUMBER
MM/DD/YYYY 04/01/2015	MM/DD/YYYY 04/30/2015

ATTN: DWAYNE ALLEN, PUBLIC WORKS DIR

PARAMETER	SAMPLE MEASUREMENT	QUANTITY OR LOADING		QUALITY OR CONCENTRATION		UNITS	NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE
		VALUE	UNITS	VALUE	UNITS				
Coliform, fecal general	SAMPLE MEASUREMENT	*****	*****	*****	*****	*****	0	3mo	GRAB
74055 1 0 Effluent Gross Overflows	PERMIT REQUIREMENT	*****	*****	7	200 30DA GEO *****	#/100mL	0	Three per Month	GRAB
74062 S 0 See Comments	SAMPLE MEASUREMENT	0	over 70	*****	*****	*****	0	Comments	COMPOS
74062 S 0 See Comments	PERMIT REQUIREMENT	Req. Mon. MO TOTAL	occur/mo	*****	*****	*****	0	See Comments	See Comments
74063 S 0 See Comments	SAMPLE MEASUREMENT	0	gal	*****	*****	*****	0	Comments	COMPOS
BOD, carbonaceous, 05 day, 20 C	PERMIT REQUIREMENT	Req. Mon. MO TOTAL	gal	*****	*****	*****	0	See Comments	See Comments
80082 1 0 Effluent Gross	SAMPLE MEASUREMENT	5.8	lb/d	<2.0	10 MO AVG	mg/L	0	3mo	COMPOS
	PERMIT REQUIREMENT	75.1 MO AVG	lb/d	*****	15 7 DA AVG	mg/L	0	Three per Month	COMPOS

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER <i>Dwaine Allen</i>	SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT <i>[Signature]</i>	TELEPHONE 479-253-9100	DATE 05/03/2015
TYPED OR PRINTED		AREA Code	NUMBER
			MM/DD/YYYY

COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)  
Report flow as monthly average & daily maximum in million gallons per day. (S) Use Overflows (74062) to report total number of SSOs/Month. Use Overflow volume (74063) to report total volume of SSOs in gallons/month. Report "0" (zero), if no overflows during the entire month. See Part II. 5. (SSO): 08-00036



View Copy of Submission Details

**Permit** AR0021865  
**Permit ID:** AR0021865  
**Permittee:** EUREKA SPRINGS, CITY OF  
**Facility:** EUREKA SPRINGS, CITY OF  
**Permitted Feature:** 001 - External Outfall  
**Report Dates & Status** From 12/01/16 to 12/31/16  
**Monitoring Period:** NetDMR Validated  
**Status:**

Considerations for Form Completion

Report flow as monthly average & daily maximum in million gallons per day. (S) Use Overflows (74062) to report total number of SSOs/month. Use Overflow volume (74063) to report total volume of SSOs in gallons/month. Report "0" (zero), if no overflows during the entire month. See Part II. 5. (SSO). 08-00036

Principal Executive Officer

**First Name:** Butch  
**Title:** Mayor  
**Last Name:** Berry  
**Telephone:** 479-253-9600

Code	Parameter Name	Quantity or Loading		Quality or Concentration			# of Ex.	Freq. of Analysis	Smpl. Type
		Value 1	Value 2	Units	Value 1	Value 2			
00300	Oxygen, dissolved [DO]						0	03/30 - Three Per Month	GR - GRAB
1 -	Effluent Gross			=6.7					
Season: 0				>=6.5 INST MIN					
NODI: -									
00400	pH						0	03/30 - Three Per Month	GR - GRAB
1 -	Effluent Gross			=6.4		=6.8			
Season: 0				>=6 MINIMUM		<=9 MAXIMUM			
NODI: -									
00530	Solids, total suspended						0	03/30 - Three Per Month	CP - COMPOS
1 -	Effluent Gross	<5.2		26 - lb/d	<2				
Season: 0				26 - lb/d	<=112.6 MO AVG	<=22.5 7 DA AVG			
NODI: -									
00610	Nitrogen, ammonia total [as N]						0	03/30 - Three Per Month	CP - COMPOS
1 -	Effluent Gross	<0.2		26 - lb/d	<0.1				
Season: 1				26 - lb/d	<=37.6 MO AVG	<=7.5 7 DA AVG			
NODI: -									
00630	Nitrite + Nitrate total [as N]						0	03/30 - Three Per Month	CP - COMPOS
1 -	Effluent Gross	<2.4		26 - lb/d	<1	<1.2			

Code	Name	Value 1	Value 2	Units	Value 1	Value 2	Value 3	Units	Ex.	Analysis
1 - Effluent Gross										
Season: 0		<=75.1 MO AVG		26 - lb/d			<=15.7 DA AVG	19 - mg/L		03/30 - Three Per Month
NODI: -										
00665 Phosphorus, total [as P]										
1 - Effluent Gross		<0.3		26 - lb/d			<0.2	19 - mg/L	0	03/30 - Three Per Month
Season: 0		<=7.5 MO AVG		26 - lb/d			<=2.7 DA AVG	19 - mg/L		03/30 - Three Per Month
NODI: -										
50050 Flow, in conduit or thru treatment plant										
1 - Effluent Gross		=0.3107	=0.4048	03 - MGD					0	01/01 - Daily
Season: 0		Req Mon MO AVG	Req Mon DAILY MX	03 - MGD						01/01 - Daily
NODI: -										
74055 Coliform, fecal general										
1 - Effluent Gross										
Season: 0									0	03/30 - Three Per Month
NODI: -										
74062 Overflows										
S - See Comments		=0		93 - occur/mo					0	999 - See Comments
Season: 0		Req Mon MO TOTAL		93 - occur/mo						999 - See Comments
NODI: -										
74063 Overflow volume [SS0 volume, CSO volume]										
S - See Comments		=0		57 - gal					0	999 - See Comments
Season: 0		Req Mon MO TOTAL		57 - gal						999 - See Comments
NODI: -										
80082 BOD, carbonaceous [5 day, 20 C]										
1 - Effluent Gross		<4.8		26 - lb/d					0	03/30 - Three Per Month
Season: 0		<=75.1 MO AVG		26 - lb/d			<=15.7 DA AVG	19 - mg/L		03/30 - Three Per Month
NODI: -										

**Submission Note**  
 If a parameter row does not contain any values for the Sample nor Effluent Trading, then none of the following fields will be submitted for that row: Units, Number of Excursions, Frequency of Analysis, and Sample Type.

**Edit Check Errors**

No errors.

**Comments**

**Attachments**

No attachments.

**Report Last Saved By**

**EUREKA SPRINGS, CITY OF**

User:

Name:

F:\M...

dallen@eureka Springs, AR.gov

Dwayne Allen





Attachment 3: DMRs for April 2015, December 2016, and October 2017.

Code	Name	Value 1	Value 2	Units	Value 1	Value 2	Value 3	Units	Ex.	Analysis
1 - Effluent Gross										
Season: 0	Req. <=75.1 MO AVG			26 - lb/d			<=15.7 DA AVG	19 - mg/L		03/30 - Three Per Month
NODI: -										
00665 Phosphorus, total [as P]										
1 - Effluent Gross	Req. =1.2			26 - lb/d			=1	19 - mg/L	0	03/30 - Three Per Month
Season: 0	Req. <=7.5 MO AVG			26 - lb/d			<=2.7 DA AVG	19 - mg/L		03/30 - Three Per Month
NODI: -										
50050 Flow, in conduit or thru treatment plant										
1 - Effluent Gross	Req. =0.4175			03 - MGD					0	01/01 - Daily
Season: 0	Req. Mon MO AVG			03 - MGD						01/01 - Daily
NODI: -										
74055 Coliform, fecal general										
1 - Effluent Gross										
Season: 0	Req. =0									
NODI: -										
74062 Overflows										
S - See Comments										
Season: 0	Req. =0									
NODI: -										
74063 Overflow volume [SS0 volume, CSO volume]										
S - See Comments										
Season: 0	Req. =0									
NODI: -										
80082 BOD, carbonaceous [5 day, 20 C]										
1 - Effluent Gross	Req. <6									
Season: 0	Req. <=75.1 MO AVG			26 - lb/d			<2	19 - mg/L	0	03/30 - Three Per Month
NODI: -										

**Submission Note**

If a parameter row does not contain any values for the Sample nor Effluent Trading, then none of the following fields will be submitted for that row: Units, Number of Excursions, Frequency of Analysis, and Sample Type.

**Edit Check Errors**

No errors.

**Comments**

**Attachments**

No attachments.

**Report Last Saved By**

EUREKA SPRINGS, CITY OF

User:

Name:

E M A T I

dallen@eureka Springs, AR, gov

Wayne Allen

Environmental Services Company, Inc.

Corporate Office  
 13715 West Markham  
 Little Rock, AR 72211  
 Tel. (501)221-2565 Fax (501)221-1341

Northwest Arkansas Branch  
 1107 Century Avenue  
 Springdale, AR 72762  
 Tel. (479)750-1170 Fax (479)750-1172

Control Number: 1702020380  
 Customer Name: EUREKA SPRINGS, CITY OF  
 Customer Number: 1515  
 Report Date: 02/25/17  
 Sample Date: 02/16/17  
 Sample Time: 0800  
 Sample Type: GRAB  
 Sample From: ROW C9116  
 Collected By: KY  
 Delivery By: KY  
 Work Order:  
 Purchase Order:

Analysis		Laboratory Analysis			Quality Assurance			
Date	Time By	Parameter	Result	Notes	Quantity	Method	Precision % RPD	Accuracy % Recovery
02/21	1000 RAH	Metals Digestion	1			1996 EPA 3050B	0.00	100.0 *
02/23	0845 TSB	Ammonia Nitrogen	1564.88 mg/kg			SM 1997 4500-NH3 C	0.26	91.2 *
02/24	1230 RAH	Mercury	< 0.1394 mg/kg			SW-846 7474 02/07	2.17	93.7
02/22	0800 TSB	Kjeldahl Nitrogen Total	16469.81 mg/kg			SM 1997 4500-NorgB	1.70	97.5 *
02/23	0925 TSB	Nitrate Nitrogen	116.044 mg/kg			SM 2000 4500-NO3 E	1.03	104.3
02/23	0925 TSB	Nitrite Nitrogen	2.431 mg/kg			SM 2000 4500-NO2 B	1.03	104.3
02/24	1230 TSB	Phosphorous, Total (as P)	8399.9950 mg/kg			EPA 365.3	2.41	100.6 *
02/22	1743 RAH	Potassium, Total	3524.50 mg/kg			SW846 6020A	0.90	121.1 *
02/17	0854 AEU	pH, Soil	7.70 S.U.			SM 2000 4500-H+ B	0.00	0.0
02/22	1743 RAH	Chromium, Total	4.50 mg/kg			SW846 6020A	1.05	94.2 *
02/22	1743 RAH	Nickel, Total	5.50 mg/kg			SW846 6020A	0.85	95.6 *
02/22	1743 RAH	Copper, Total	61.50 mg/kg			SW846 6020A	2.45	96.0 *
02/20	1142 AEU	Solids, % Volatile	68.300 %			SM 1997 2540 G	3.43	0.0
02/22	1743 RAH	Zinc, Total	29.00 mg/kg			SW846 6020A	4.92	95.8 *
02/22	1743 RAH	Arsenic, Total	< 2.50 mg/kg			SW846 6020A	0.85	101.7 *
02/22	1743 RAH	Selenium, Total	< 2.50 mg/kg			SW846 6020A	4.58	103.3 *
02/22	1743 RAH	Molybdenum, Total	< 2.50 mg/kg			SW846 6020A	3.46	94.7 *
02/21	0800 JCB	Salmonella	< 2 MPN/g			SM 18th 9260 D	0.00	0.0
02/17	1500 AEU	Fecal Coliform(MPN)	< 2 MPN/g			SM 9221 E A-1 2006	0.00	0.0
02/22	1743 RAH	Cadmium, Total	< 2.50 mg/kg			SW846 6020A	2.58	104.7 *
02/17	0930 AEU	Solids, % Total by mass	71.730 %			SM 1997 2540 G	1.10	N/A

\* QA data shown is from a different sample or standard on the same date.



Customer Name : EUREKA SPRINGS, CITY OF  
 Control Number: 1702020380

Analysis		Laboratory Analysis			Quality Assurance			
Date	Time By	Parameter	Result	Notes	Quantity	Method	Precision & RPD	Accuracy & Recovery
02/22	1743	RAH Lead, Total	22.00 mg/kg			SW846 6020A	4.07	97.7 *

\* QA data shown is from a different sample or standard on the same date.

All equipment used is checked and/or calibrated daily. All NPDES testing is conducted in accordance with 40 CFR Part 136. A minimum of 10% spiked and duplicate samples is run on each parameter where applicable for Quality Assurance purposes. Quality Assurance Plan on file with Arkansas Department of Environmental Quality. Analysis time indicates the time of the start of the analytical batch in which the specific sample was included.

Signature Richard Brown  
 Environmental Services Co., Inc.

Environmental Services Company, Inc.

Corporate Office  
 13715 West Markham  
 Little Rock, AR 72211  
 Tel. (501)221-2565 Fax (501)221-1341

Northwest Arkansas Branch  
 1107 Century Avenue  
 Springdale, AR 72762  
 Tel. (479)750-1170 Fax (479)750-1172

Control Number: 1702020381  
 Customer Name : EUREKA SPRINGS, CITY OF  
 Customer Number : 1515  
 Report Date : 02/25/17

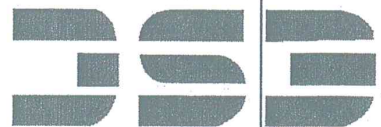
Sample Date : 02/16/17  
 Sample Time : 0800  
 Sample Type : GRAB  
 Sample From : ROW A 81616

Collected By: KY  
 Delivery By : KY  
 Work Order :  
 Purchase Order :

Analysis		Laboratory Analysis		Quality Assurance				
Date	Time By	Parameter	Result	Notes	Quantity	Method	Precision % RPD	Accuracy % Recovery
02/21	1000 RAH	Metals Digestion	1			1996 EPA 3050B	0.00	100.0 *
02/23	0845 TSB	Ammonia Nitrogen	152.30 mg/kg			SM 1997 4500-NH3 C	0.26	91.2 *
02/24	1230 RAH	Mercury	< 0.1612 mg/kg			SW-846 7474 02/07	2.17	93.7 *
02/22	0800 TSB	Kjeldahl Nitrogen Total	16275.83 mg/kg			SM 1997 4500-NORGB	1.70	97.5 *
02/23	0925 TSB	Nitrate Nitrogen	80.797 mg/kg			SM 2000 4500-NO3 E	1.03	104.3 *
02/23	0925 TSB	Nitrite Nitrogen	4.282 mg/kg			SM 2000 4500-NO2 B	1.03	104.3 *
02/24	1230 TSB	Phosphorous, Total (as P)	6539.1580 mg/kg			EPA 365.3	2.41	100.6 *
02/22	1743 RAH	Potassium, Total	3174.50 mg/kg			SW846 6020A	0.90	121.1 *
02/17	0854 AEU	pH, Soil	7.20 S.U.			SM 2000 4500-H+ B	0.00	0.0 *
02/22	1743 RAH	Chromium, Total	4.00 mg/kg			SW846 6020A	1.05	94.2 *
02/22	1743 RAH	Nickel, Total	5.00 mg/kg			SW846 6020A	0.85	95.6 *
02/22	1743 RAH	Copper, Total	158.00 mg/kg			SW846 6020A	2.45	96.0 *
02/20	1142 AEU	Solids, % Volatile	69.600 %			SM 1997 2540 G	3.43	0.0 *
02/22	1743 RAH	Zinc, Total	5.50 mg/kg			SW846 6020A	4.92	95.8 *
02/22	1743 RAH	Arsenic, Total	< 2.50 mg/kg			SW846 6020A	0.85	101.7 *
02/22	1743 RAH	Selenium, Total	3.00 mg/kg			SW846 6020A	4.58	103.3 *
02/21	0800 JCB	Molybdenum, Total	< 2.50 mg/kg			SW846 6020A	3.46	94.7 *
02/17	1500 AEU	Salmonella	< 2 MPN/g			SM 18th 9260 D	0.00	0.0 *
02/22	1743 RAH	Fecal Coliform (MPN)	< 2 MPN/g			SM 9221 E A-1 2006	0.00	0.0 *
02/22	1743 RAH	Cadmium, Total	< 2.50 mg/kg			SW846 6020A	2.58	104.7 *
02/17	0930 AEU	Solids, % Total by mass	62.000 %			SM 1997 2540 G	1.10	N/A *

\* QA data shown is from a different sample or standard on the same date.





**Environmental Services Company, Inc.**  
 Corporate Office  
 13715 West Markham  
 Little Rock, Arkansas 72211  
 501-221-2565 (p)  
 501-221-1341 (f)  
 Carlsbad, New Mexico  
 575-887-7-ESC (372)  
 Springdale, Arkansas  
 479-750-1170  
[www.eslabs.com](http://www.eslabs.com)

**LABORATORY REPORT**

Client: Eureka Springs  
 Control Number: 1702020380  
 Sample Type: Grab - Solids  
 Sample Identification: Row C9116  
 Sample Date: 02/16/17  
 Receipt Date: 02/16/17  
 Report Date: 02/24/17

Analyte	Result	Detection Limit
PCB-1242	ND	0.050
PCB-1254	ND	0.050
PCB-1221	ND	0.050
PCB-1232	ND	0.050
PCB-1248	ND	0.050
PCB-1260	ND	0.050
PCB-1016	ND	0.050

Method:	EPA 608	System Monitoring Compounds	% Recovery	% Recovery Limits
Decachlorobiphenyl			116.16%	43-128
2,4,5,6-Tetrachloro-m-xylene			109.37%	35-138

Analysis Date: 02/23/2017  
 Analysis Time: 06:55  
 Analyst: RHB

A laboratory blank was monitored for all analytes of interest.

Data Release authorized by:

*Richard Brown*  
 Richard Brown



**Environmental Services Company, Inc.**

Corporate Office  
 13715 West Markham  
 Little Rock, Arkansas 72211  
 501-221-2565 (p)  
 501-221-1341 (f)  
 www.esclabs.com

Carlsbad, New Mexico  
 575-887-7-ESC (372)  
 Springdale, Arkansas  
 479-750-1170

**LABORATORY REPORT**

Client: Eureka Springs  
 Control Number: 1702020381  
 Sample Type: Grab - Solids  
 Sample Identification: Row A81616  
 Sample Date: 02/16/17  
 Receipt Date: 02/16/17  
 Report Date: 02/24/17

Analyte	Result	Detection Limit
PCB-1242	ND	0.050
PCB-1254	ND	0.050
PCB-1221	ND	0.050
PCB-1232	ND	0.050
PCB-1248	ND	0.050
PCB-1260	ND	0.050
PCB-1016	ND	0.050

Method: EPA 608  
 System Monitoring Compounds  
 2,4,5,6-Tetrachloro-m-xylene  
 Decachlorobiphenyl  
 % Recovery 92.61%  
 % Recovery Limits 35-138  
 43-128

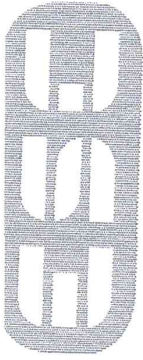
Analysis Date: 02/23/2017  
 Analysis Time: 07:27  
 Analyst: RHB

A laboratory blank was monitored for all analytes of interest.

Data Release authorized by:

*Richard Brown*  
 Richard Brown





Environmental Services Company, Inc.  
 Corporate Office  
 13715 West Markham  
 Little Rock, AR 72211  
 website: www.eslabs.com

Environmental Services Company, Inc.  
 Northwest Branch  
 1107 Century  
 Springdale, AR 72764

Phone: 501-221-2565 Fax: 501-221-1341

Phone 479-750-1170 Fax: 479-750-1172

### CHAIN OF CUSTODY

Client Information			Project Information			Requested Parameters				
Company Name:	Eureka Springs-Compost Facility	Permit/Project #:	0295-SC-R1	Metals (See Comments)			TP (01.9), PH (23.1), %VS (30.1)			
Address:	3174 E. Van Buren	Purchase Order #:		Salmonella (43.3B), Coliform (43.5)			% Solids (82.)			
Telephone:	Eureka Springs, AR	Sampler Name(s):	<i>Kris Vandell</i>	Plastic			PCBs (99.R)			
FAX:	(479)253-7410	and Signature(s):	<i>Kris Vandell</i>	Plastic			X X X X X X			
ESC Client Number:	1515			1 qt			X X X X X X			
Sample Identification			Sample Collection			Sample Containers				
Identification	ESC Control #	Date	Time	Type	Matrix	Type	Volume	Preservative	#	
Row C 9116	170220380	3/16/17	8 Am	Grab	solid	Plastic	1 qt	none	1	
Row A 81616	170220381	3/16/17	8 Am	Grab	solid	Plastic	1 qt	none	1	
Requisitioned By: (Signature and Printed Name) <i>Kris Vandell</i> Date <i>3/16/17</i> Time <i>8:30</i> Requisitioned By: (Signature and Printed Name) <i>John Byrd</i> Date <i>3/16/17</i> Time <i>12:54</i> Requisitioned By: (Signature and Printed Name) <i>John Byrd</i> Date <i>3/16/17</i> Time <i>1:40</i> Comments:										
*Metals	Hg(01.14)	Ni(28.HS)	Se(34.HS)	Flow Data	Analyst:	Field Test	Time	Analyst	Result	Units
	K(19.HS)	Cu(28.HS)	Mn(42.HS)	pH:	Time:	Temp.:	Reading:	Units:		
	Cr(24.HS)	Zn(30.HS)	Pb(82.HS)	Units:						
	As(33.HS)	Cool all samples to 6 degrees C.								

# City of Eureka Springs

Public Works Department  
3174 East Van Buren Street  
Eureka Springs, Arkansas 72632

Office of the Director, Dwayne Allen  
Phone: 479-253-9600  
Fax: 479-253-6974  
E-mail: [dallen@eurekasprings.org](mailto:dallen@eurekasprings.org)

January 03, 2018

Arkansas Department of Environmental Quality  
Office of Water Quality Inspection Branch  
5301 Northshore Drive  
N. Little Rock, AR 72116-5317

Re: AR0021865

Mr. Grimes:

The City of Eureka Springs will correct the violations noted during the field inspection on 11/30/2017 as quickly as possible and will strive to ensure that they do not occur again. We are in the process of adding materials to our spare parts inventory and upgrading our operation and maintenance manuals. The city passed an increase in wastewater rates in 2017, the first increase in nine years, which we will use to make upgrades that will improve our Wastewater Facility.

Number One;

A and B: Both are related to the damage we received to our headworks in 2017. We repaired the unit several times and finally secured funding for a new fine screen unit. The unit was installed by crane and is now ready for operation. Lakeside Equipment Corporation is scheduled to program the unit January 8, 2018, and I will notify you that it is online. Our effluent test results show grease to be within limits, but foam on both basins have increased. The improved effluent from our headworks coupled with dipping both basins with nets will bring us back to normal operation.

C: Our UV system consists of two modules, each with forty bulbs. One module is required for disinfection, and the other is required for backup. The bulbs weaken over time, and we replace them, approximately every eighteen months. We will make sure we have a case on hand and inspect all seals. Our fecal numbers have been <2 #/100ml.

D: One box of PH buffer pillows were out of date and replaced. We will now review expiration dates monthly.

NumberTwo: I have hired a new maintenance operator at the plant and have enrolled him in the Class One Wastewater Course in Fayetteville on 01/23/2018. If needed I will schedule a crew member for a few hours a week.

Number Three: PH readings will only be taken after final treatment.

# City of Eureka Springs

## Public Works Department

3174 East Van Buren Street  
Eureka Springs, Arkansas 72632

## Office of the Director, Dwayne Allen

Phone: 479-253-9600  
Fax: 479-253-6974  
E-mail: [dallen@eurekasprings.org](mailto:dallen@eurekasprings.org)

Number Four: If any additional PH and Do tests are required for maintaining proper operation they will be noted and included in our monthly averages.

Number Five: The DO and PH meters calibration forms shall be completed at the time of each meter calibration. A staff gauge will be kept on site as well

Sincerely,



Dwayne Allen,  
Public Works Director



**From:** [Dwayne Allen](#)  
**To:** [Water-Inspection-Report](#)  
**Subject:** AR0021865  
**Date:** Tuesday, January 16, 2018 12:11:02 PM

---

Update on the inspection of 11/30/2017. The repairs to our headworks were completed on 01/10/2018. The unit is fully functional and performing normally.

*DAllen*

Director of Public Works  
3174 East Van Buren  
Eureka Springs, AR 72632-9498  
(479) 253-8868  
Fax (479) 253-6974

# ADEQ

ARKANSAS  
Department of Environmental Quality

February 12, 2018

Butch Berry, Mayor  
City of Eureka Springs  
44 South Main Street  
Eureka Springs, AR 72632

Re: Eureka Springs WWTP Facility – Inadequate Response to Inspection  
AFIN: 08-00036 Permit No.: AR0021865

Dear Mr. Berry:

I have reviewed your response pertaining to my November 30, 2017 inspection of your wastewater treatment facility. After review the information provided does not sufficiently address the violations referenced in my inspection report. Please see my comments below:

- 1.) Part III, Section B.1.A of the permit:
  - A. In your response you state that with the functional headworks unit and net dipping, you will be able to return the basins to normal operation. Please send photographs showing that this has occurred.
  - B. In your response you state that the bulb seals will be inspected within the UV treatment system and that you will keep a spare case of bulbs on-hand. Please give a timeline when these two items will be accomplished. Please submit photographs showing the repaired/replaced bulbs in the unit.
- 2.) Part III, Section C.7 of the permit: In your response you state that calibration records will be maintained by the facility. Please send a copy of these records for review.

This work/documentation should be completed/submitted as soon as possible. Please provide the information no later than **February 28, 2018**.

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 [grimesg@adeq.state.ar.us](mailto:grimesg@adeq.state.ar.us).

Sincerely,



Garrett Grimes  
District 1 Field Inspector  
Office of Water Quality

# City of Eureka Springs

Public Works Department  
3174 East Van Buren Street  
Eureka Springs, Arkansas 72632

Office of the Director, Dwayne Allen  
Phone: 479-253-9600  
Fax: 479-253-6974  
E-mail: [dallen@eurekasprings.org](mailto:dallen@eurekasprings.org)

February 13, 2018

Arkansas Department of Environmental Quality  
Office of Water Quality Inspection Branch  
5301 Northshore Drive  
N. Little Rock, AR 72116-5317

Re: AR0021865-AFIN:08-00036


Mr. Grimes:

I have attached a document that addresses the items not sufficiently covered in our response to the November 30, 2017, field inspection of our Wastewater Facility. I will also include in the submission photos of our basins and headworks.

The only item that will require updating is our UV system. We discovered several bad ballasts while replacing bulbs. The parts will take up to six weeks to arrive. As soon as we have the repairs completed, I will notify you and submit photos. The unit is still producing sufficient disinfection, but we shall make the repairs as quickly as possible and then maintain our parts inventory to cover any shipping delays.

If you have any questions or require any further information, please let me know.

Sincerely,

  
Dwayne Allen,  
Public Works Director

Cc: Inspection Update Document

## ATTACHMENT

This document is meant to serve as an official response to the violations referenced in the follow-up letter dated January 26, 2018, from Mr. Garrett Grimes as a result of his Compliance Evaluation Inspection conducted on November 30, 2017, of the Eureka Springs Wastewater Treatment Plant, Eureka Springs, Arkansas. AFIN: 08-00036 and NPDES Permit No: AR0021865.

Following is a summary of the violations that were not satisfactorily addressed in our previous reply to the Compliance Evaluation Inspection of November 30, 2018.

- 1) **Part III. Section B.1.A of the permit:**
  - A. In your response, you state that with the functional headworks unit and net dipping, you will be able to return the basins to normal operation. Please send photographs showing that this has occurred.
  - C. In your response, you state that the bulb seals will be inspected within the UV treatment system and that you will keep a spare case of bulbs on-hand. Please give a timeline when these two items will be accomplished. Please submit photographs showing the repaired/replaced bulbs in the unit.
- 2) **Part III. Section C.7 of the permit:** In your response, you state the calibration records will be maintained by the facility. Please send a copy of these records for review.

Following is a brief description of the items of concern noted in your letter dated January 26, 2018 which was a reply to our official response to the Compliance Evaluation Inspection conducted on our wastewater treatment facility on November 30, 2017 by Mr. Garrett Grimes, a District 1 Field Inspector with the Arkansas Department of Environmental Quality.

- 1) **Part III. Section B.1.A of the permit:**
  - A. In your response, you state that with the functional headworks unit and net dipping, you will be able to return the basins to normal operation. Please send photographs showing that this has occurred.

**RESPONSE:** As stated in our original response to the CEI of November 30, 2017, we had scheduled a service technician to assist with the start-up of the Lakeside unit at our headworks on January 8, 2018. Start-up did occur as scheduled and the Lakeside unit was powered up and began operating on January 9, 2018. Since

that time, the unit has removed several fifty-five (55)-gallon barrels of floatable material as well as grit and small solids from the wastewater influent as it enters our wastewater treatment facility. Currently, this unit is removing approximately one 55-gallon barrel of floatable material and between a quarter and a third of a barrel of grit and small solids a week from the influent flow. Pictures showing the operation of the Lakeside unit are attached. Additionally, we are continuing to use a dip net to remove floatables that had previously entered the SBR basins which have resulted in the removal of several 5-gallon buckets of floatable material. The improved appearance of the surface of the SBR basins is noted by the attached pictures.

1) **Part III. Section B.1.A of the permit:**

C. In your response, you state that the bulb seals will be inspected within the UV treatment system and that you will keep a spare case of bulbs on-hand. Please give a timeline when these two items will be accomplished, Please send photographs showing that this has occurred.

**RESPONSE:** As stated in our original response to the CEI of November 30, 2017, we are in the process of inspecting the entire UV treatment system, checking for bulbs that are burned out, checking for water seals that are not performing properly and checking for ballasts that are bad that require replacement. To date, we have gone through one of the two UV modules, replaced the bulbs that were burned out, replaced some water seals that were found to be defective and replaced the ballasts that were found to be defective. During this process, we also discovered some quartz sleeves that had become cracked since the last inspection and they were replaced as well. We have attached pictures to show the bulbs, ballasts and quartz sleeves that were found to be defective that we have replaced. We have also attached pictures which show the condition of the water seals before they are placed in service, which also serves to show that we currently have a supply of extra water seals to replace other water seals as they are found to be defective. And finally, we have attached a picture labeled **NEW UV BULBS** to show the bulbs that we currently have on hand as spares, Finally, we have attached pictures labeled **UV BULBS PO LETTER** and to show that we have ordered additional UV bulbs, UV ballasts and quartz sleeves to provide us the necessary quantity of items to go through the second of the two UV modules, replacing bulbs that are burned out, replacing water seals that are found to be defective and replacing the ballasts that were found to be defective. At this time, we are unable to provide you with an exact timeline of when this issue will be completed, because we have to wait for the additional UV bulbs and ballasts to be delivered before we can continue, but we assure you that we will strive to have this issue completely addressed and rectified as quickly as possible once the replacement bulbs and ballasts arrive. At this time, we are being told that delivery of the bulbs and ballasts will occur within approximately

six weeks. It is estimated that it will then take at least a week for us to go through the second UV module replacing the burned out bulbs, checking for replacing the defective water seals and checking the functionality of each of the ballasts.

- 2) **Part III. Section C.7 of the permit:** In your response, you state the calibration records will be maintained by the facility. Please send a copy of these records for review.

**RESPONSE:** As stated in our original response to the CEI of November 30, 2017, we began recording the time, date and other pertinent information every time that either the dissolved oxygen meter or the pH meter were used following the adage that partially states “if you don’t document it, you didn’t do it.” These calibration records can be seen in the attached pictures.



SBR #1 PICTURE #2  
EUREKA SPRINGS WWTP



SBR #2 Picture #1  
Eureka Springs WWTP

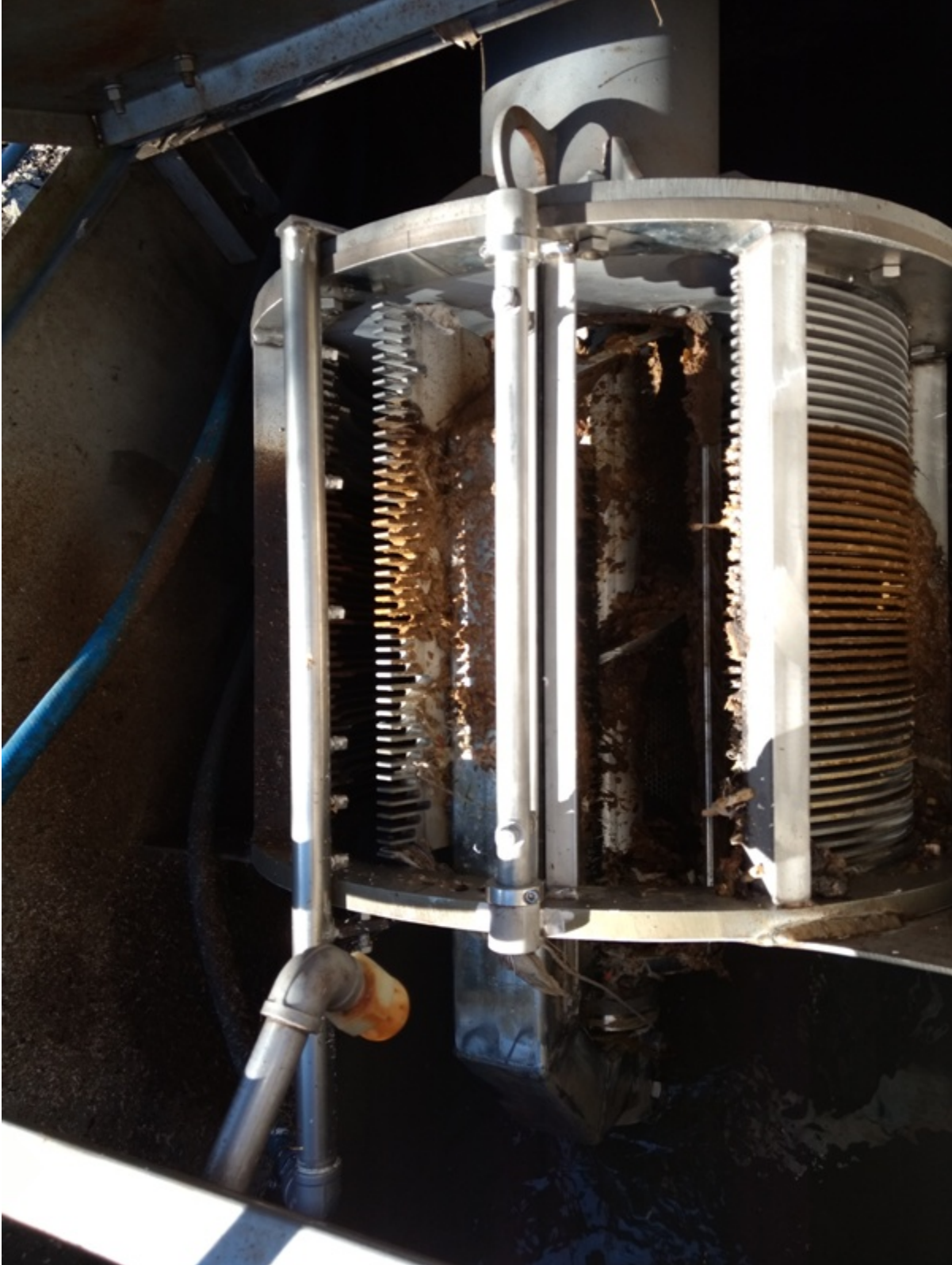


LAKESIDE PICTURE #2  
EUREKA SPRINGS WWTP





LAKESIDE PICTURE #3  
EUREKA SPRINGS WWTP





DEC 2017 Dissolved Oxygen Calibration  
Eureka Springs WWTP

### Eureka Springs Wastewater Treatment Facility

#### Dissolved Oxygen Calibration Sheet

MONTH: Dec 2017

DATE	TIME	INIT	CAL. VALUE	MEMBRANE	INIT
1				CD/11/2017	TC
2					
3					
4	1200	TC	9970		
5					
6					
7	1245	TC	9970		
8					
9					
10					
11					
12	1305	TC	9770		
13					
14					
15					
16					
17					
18					
19	0945	F	9870		
20					
21					
22					
23					
24					

December 2017 pH Calibration  
 Eureka Springs WWTP

Eureka Springs Wastewater Treatment Facility

pH Calibration Sheet

MONTH: DEC 2017

DATE	INIT	TIME	TEMP	CALIBRATION READINGS			BUFFER CHANGE
				4.0 BUFFER	7.0 BUFFER	10.0 BUFFER	
1							
2							
3							
4							
5							
6							
7	TR	1112	21	4.01	7.00	10.05	
8							
9							
10							
11							
12							
13	TR	1420	21	4.00	7.02	10.03	
14							
15							
16							
17							
18							
19							
20							
21	TR	0950	21	4.01	7.00	9.99	
22							
23							
24							
25							
26							
27							
28							
29							
30							

NEW UV BULBS  
EUREKA SPRINGS WWTP





OLD UV BULBS PIC #2  
EUREKA SPRINGS WWTP





OLD QUARTZ SLEEVES  
EUREKA SPRINGS WWTP



UV Bulbs PO Letter  
Eureka Springs WWTP

February 9, 2018

Terry R. Long, Plant Manager  
Eureka Springs Wastewater Treatment Facility  
100 Highway 23 North  
Eureka Springs, AR 72632

Richard Keller  
**SUEZ, Inc.**  
600 Willow Tree Road  
Leonia, NJ 07605

Good Morning Richard,

I am receipt of your **quote # 230017231** for replacement Ballast Assemblies, UV Lamps and Quartz Jackets which is dated 01/31/2018.

This letter references our **PO# 19773** and is meant to serve as authorization for you to proceed with the order processing with the changes made to the quantities as shown on the following copy of your **quote # 230017231**.

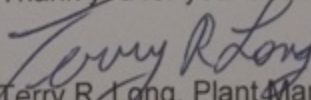
My contact information as well as shipping and billing information is below:

Shipping: Eureka Springs Wastewater Treatment Facility  
100 Highway 23 North  
Eureka Springs, AR 72632

Billing: Eureka Springs Public Works Department  
3174 E. Van Buren  
Eureka Springs, AR 72632  
479-253-9600 – Office  
479-253-6974 – Fax

If you require any additional information, please let me know.

Thank you for your assistance.

  
Terry R. Long, Plant Manager  
Eureka Springs Wastewater Treatment Facility  
100 Highway 23 North  
Eureka Springs, AR 72632  
[eswwtp@yahoo.com](mailto:eswwtp@yahoo.com)  
479-981-0707 – cell  
479-253-6974 – fax

# ADEQ

ARKANSAS  
Department of Environmental Quality

February 26, 2018

Butch Berry, Mayor  
City of Eureka Springs  
44 South Main Street  
Eureka Springs, AR 72632

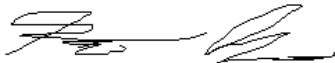
RE: Adequate Response to Inspection  
AFIN: 08-00036 Permit No.: AR0021865

Dear Mayor Berry:

The Department has received your January 3, 2018, and February 13, 2018, responses to the inspection conducted on November 30, 2017. Your response adequately addresses the request in the Summary of Findings section of the report. However, the City of Eureka Springs Public Works Department should make sure that all necessary information is included on the lab calibration forms including pre and post calibration measurements and slope values where applicable.

Acceptance of this response by the Department does not preclude any future enforcement action deemed necessary at this site or any other site. If I need further information concerning this matter, I will contact you. Thank you for your attention to this matter. If I can be any assistance please feel free to contact me at [grimesg@adeq.state.ar.us](mailto:grimesg@adeq.state.ar.us) or 479.267.0811 ext. 16.

Sincerely,



Garrett Grimes  
District 1 Field Inspector  
Office of Water Quality

Cc: Terry Long, Plant Manager, City of Eureka Springs, 3174 E. Van Buren, Eureka Springs, AR 72632