

ADEQ

ARKANSAS
Department of Environmental Quality

July 3, 2018

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

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

Dear Mr. Allen Dwayne:

On June 21, 2018, I performed a Reconnaissance 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 Water Division Inspection Branch at the address at the bottom of this letter or e-mailed to 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 **July 18, 2018**.

If I can be of any assistance, please contact me at nautiyal@adeq.state.ar.us or 479-267-0811 ext. 12.

Sincerely,





Ankush Nautiyal
District 1 Field Inspector
Office of Water Quality

 A R K A N S A S Department of Environmental Quality	WATER DIVISION INSPECTION REPORT				
	AFIN: 08-00036	PERMIT #: AR0021865	DATE: 6/21/2018		
	COUNTY: 08 Carroll	PDS #: 103555	MEDIA: WN		
	GPS LAT: 36.420282 LONG: -93.734920 LOCATION: General Area				
FACILITY INFORMATION		INSPECTION INFORMATION			
NAME: City of Eureka Springs WWTP LOCATION: 100 Highway 23 North CITY: Eureka Springs		FACILITY TYPE: 1 - Municipal INSPECTOR ID#: 120809 S - State FACILITY EVALUATION RATING: *** INSPECTION TYPE: Reconnaissance			
RESPONSIBLE OFFICIAL		DATE(S): 6/21/2018 ENTRY TIME: 10:55 EXIT TIME: 11:45 PERMIT EFFECTIVE DATE: 3/1/2013 PERMIT EXPIRATION DATE: 2/28/2018			
NAME / TITLE: Allen Dwayne / Director of Public Works COMPANY: City of Eureka Springs MAILING ADDRESS: 3174 E. Van Buren CITY, STATE, ZIP: Eureka Springs AR 72632 PHONE & EXT: / FAX: 479-253-8868 / EMAIL: dallen@cityofeurekasprings.org		INSPECTION PARTICIPANTS			
CONTACTED DURING INSPECTION: ***		NAME/TITLE/PHONE/FAX/EMAIL/ETC.: Garrett Grimes, ADEQ District 1 Inspector Terry Long, Plant Manager, Eureka Springs WWTP			
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>Upstream from the WWTP, the creek did not show any sludge (See photo # 6). No sludge was noticed near the outfall (See photo #5). However, downstream from the outfall, some deposited material was noticed which appeared to be sludge (See photos #1 and 2). According to Inspector Grimes, the deposited material had Sulphur odor. Since the sludge seemed old and decomposing, it could have been there due to previous upsets. Presence of sludge in the stream is violation of Part I, Section A of the permit which states: There shall be no discharge of distinctly visible solids, scum, or foam of a persistent nature, nor shall there be any formation of slime, bottom deposits, or sludge banks. There shall be no visible sheen due to the presence of oil (Sheen means an iridescent appearance on the surface of the water.</p> <p>Please provide a response for the following concerns:</p> <ol style="list-style-type: none"> 1. A. The facility needs to identify the reasons behind the presence of sludge in the creek. B. The facility needs to take proper steps to prevent re-occurrence of any such events which can result in sludge discharge. C. The facility needs to ensure proper clean up. 2. A pipe (not the permitted outfall) was discharging water (See photo #3), Mr. Long was requested to identify the source of this discharge. 3. Water was seeping out of the ground from multiple locations near the facility (See photo #8). Mr. Long mentioned that a water pipeline passes through that area and is probably leaking. He mentioned that he was not aware about this leakage and will work on getting it fixed. Please describe if the source of this leak was confirmed. 					

GENERAL COMMENTS

The inspection was conducted to investigate the complaints regarding discharge of sludge in Leatherwood Creek by Eureka Springs WWTP. Mr. Terry Long said that every morning, after his arrival at the plant, he checks the creek for any discharge. He further mentioned that he noticed that about three weeks ago, the creek was running muddy. The discharge from their WWTP was clear and the mud was coming from up-town. He said that a sink hole had developed so he was wondering if the muddy creek was a pre-cursor for the sink-hole development. He further mentioned that it is just his speculation. He also mentioned that another sink hole has developed since then.

There were multiple pipes with no discharge (See photo # 7). Mr. Long mentioned that those are older pipes for discharge and by-passes, which are no longer in use.

INSPECTOR'S SIGNATURE:  Ankush Nautiyal	DATE: 06/28/2018
SUPERVISOR'S SIGNATURE:  Jason Bolenbaugh	DATE: 7/2/2018

Water Division Photographic Evidence Sheet

Location:	City of Eureka Springs WWTP, Leatherwood Creek		
Photographer:	Ankush Nautiyal	Date:	06/21/2018
Time:	11:13	Witness:	
Photo #:	1	Description: Sludge deposited on the stream bank	



Photographer:	Garrett Grimes	Date:	06/21/2018
Time:	11:12	Witness:	
Photo #:	2	Description: Sludge accumulation on the stream bank	



Water Division Photographic Evidence Sheet

Location:	City of Eureka Springs WWTP		
Photographer:	Ankush Nautiyal	Date:	06/21/2018
Time:	11:18	Photo #:	3
Witness:			
Description:	A pipe coming from the facility was discharging water		



Photographer:	Ankush Nautiyal	Date:	
Time:	11:22	Photo #:	4
Witness:			
Description:	Outfall discharge appeared clear		



Water Division Photographic Evidence Sheet

Location:	City of Eureka Springs WWTP, Leatherwood Creek		
Photographer:	Ankush Nautiyal	Date:	06/21/2018
Time:	11:22	Witness:	
Photo #:	5	Description: Stream was clear at the outfall discharge location	



Photographer:	Ankush Nautiyal	Date:	06/21/2018
Time:	11:28	Witness:	
Photo #:	6	Description: Upstream was clear	



Water Division Photographic Evidence Sheet

Location:	City of Eureka Springs WWTP		
Photographer:	Ankush Nautiyal	Date:	06/21/2018
Time:	11:24	Witness:	
Photo #:	7		

Description: **Extra pipes were present but did not have any discharges. Mr. Long mentioned that they were part of the older treatment part and were not in use anymore**



Photographer:	Ankush Nautiyal	Date:	06/21/2018
Time:	11:29	Witness:	
Photo #:	8		

Description: **Water was seeping out of multiple locations. Mr. Long mentioned that a water pipeline passes through that area and is probably leaking**





Site Map: The WWTP has been indicated with a pushpin label and Leatherwood Creek with downward arrowhead

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

July 17, 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

Ms. Nautiyal:

I have attached a document that addresses the summary of findings from the June 21, 2018, Field Inspection of our Wastewater Facility. I will also include in the submission photos of our repairs.

As noted in the report we are uncertain if the two large construction projects upstream of the plant contributed to the quality of the East Leatherwood. In any case, the condition of the stream below our Wastewater Facility is a constant priority for Mr. Long and myself. We have reviewed our Operation and Maintenance Procedures and Discharge Monitoring Reports. We have scheduled an update to the Wonderware that controls the plant this year, and I will include a complete control system evaluation as well.

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

Sincerely,



Dwayne Allen,
Public Works Director

Cc: Inspection Update Document

July 16, 2018

RE: ADEQ Wastewater Inspection - June 21, 2018,
AFIN: 08-00036 Permit No.: AR0021865

Office of Water Quality Inspection Branch
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, Arkansas 72118-5317

Ms. Nautiyal:

The following is in response to the violations noted from a Reconnaissance Inspection conducted on our facility of June 21, 2018, by Ms. Ankush Nautiyal, a District 1 Field Inspector with the Arkansas Department of Environmental Quality, accompanying Ms. Nautiyal was Mr. Garrett Grimes a District 1 Field Inspector with the Arkansas Department of Environmental Quality

A summary of the findings is listed below and following that, you will find a narrative that addresses each violation individually which will contain: 1) Step(s) to be taken (or already taken) to correct the violation; 2) Time frame for the violation to be corrected; and 3) Steps taken to prevent a future occurrence.

Finding #1 - This violation has three (3) separate items noted as shown below.

- A The facility needs to identify the reasons behind the presence of sludge in the creek.
- B The facility needs to take proper steps to prevent re-occurrence of any such events which can result in sludge discharge.
- C The facility needs to ensure proper cleanup.

Finding #2 - A pipe (not the permitted outfall) was discharging water (see photo #3), Mr. Long was requested to identify the source of this discharge.

Finding #3 - Water was seeping out of the ground from multiple locations near the facility (see photo #8). Mr. Long mentioned that a water pipeline passes through that area and is probably leaking. He mentioned that he was not aware of this leakage and will work on getting it fixed. Please describe if the source of this leak was confirmed.

This section contains our response to the findings of the reconnaissance Inspection and following the narratives you will please find pictures which further document what was stated.

Finding #1

Part A The facility needs to identify the reasons behind the presence of sludge in the creek.

At this time, we do not have a definitive reason as to why there may have been sludge in the creek, although during a discharge over the weekend there could have been a small quantity of biosolids that floated to the top as a result of denitrification during a decant event and was inadvertently discharged with the rest of the clear effluent.

Part B The facility needs to take proper steps to prevent re-occurrence of any such events which can result in sludge discharge.

We, the facility as a whole as well as the individual operators, take a great deal of pride in our jobs and the quality of water that we discharge into Leatherwood Creek, so we continually watch the quality of our effluent as it is being discharged. As a result, we always attempt to make the appropriate changes to the treatment processes to help ensure that we only discharge a high quality, clear effluent.

At this time, in an effort to prevent any type of sludge discharge, we have made minor adjustments to the amount of time that the blowers are operating in the SBR basins to ensure that we are putting a sufficient amount of air into the mixed liquor at the proper times to facilitate the release of nitrogen gas at times other than during the settling and decant cycles of our treatment process. We have also raised the bottom level of our decants slightly so as not to allow the flow of the clear effluent being discharged to disturb the sludge blanket on the bottoms of the SBR basins. Additionally, we have been making additional checks of the facility during weekends and holidays so that if there is any sign of a discharge of biosolids changes to the process can be made immediately.

The facility needs to ensure proper cleanup.

Part C

We had our people get in the creek the afternoon of June 21 with shovels and 5-gallon buckets to further investigate the presence of any suspected sludge and to begin the clean-up operation. The clean-up operation involved the gentle removal of any substance which appeared to be sludge, as well as the soil surrounding and below the suspected substance. The suspected sludge and surrounding soil, removed from Leatherwood Creek were disposed of by adding it to the pressed biosolids coming off our belt press and shipped to the landfill for disposal.

Clean-Up of the suspected substance was completed on June 22, 2018. Please see our picture #4 which shows one of the buckets of suspected material removed from Leatherwood Creek during our clean-up operation.

Finding #2 - A pipe (not the permitted outfall) was discharging water (see photo #3), Mr. Long was requested to identify the source of this discharge.

This pipe is not on any drawings or plans that we have of the facility, so without digging up the pipe, it is impossible to be certain what it is or where it comes from. We did, however, talk to the only person who was employed by public works department during the construction of the new plant to see if he knew anything about where the pipe came from, or what purpose the pipe might have served. He said that the current grade level surrounding the plant is several feet higher than it was before construction was started, and that the footings for the new structures were actually poured near or below the level of the bottom of Leatherwood Creek, and that the construction company had several drain pipes in use during construction just to keep the groundwater drained away from the construction site, and he couldn't remember if they removed all the drain pipes before backfilling. So, with that being said, it is our best estimation that the pipe in question is left over from the construction of the new treatment facility and was draining groundwater away from the foundation of the treatment facility. We did apply, with glue, a 4-inch cleanout cap on the end of the pipe to stop the flow of water into the creek. We also collected a sample of water exiting from the pipe and tested it in an attempt to determine the source of the water and the test results lead us to believe that the water that was flowing from the pipe was in fact groundwater. This pipe was plugged on July 12, 2018. Please see our Picture #1 which shows this pipe having been capped.

Finding #3 - Water was seeping out of the ground from multiple locations near the facility (see photo #8). Mr. Long mentioned that a water pipeline passes through that area and is probably leaking. He mentioned that he was not aware of this leakage and will work on getting it fixed. Please describe if the source of this leak was confirmed.

The water that was observed seeping out of the ground was, in fact, coming from a leak in a potable water line. As mentioned during the reconnaissance inspection, we suspected that we had a leak in the water line but had never been able to locate it, and this was, in fact, the leak that we had been searching for. The afternoon of the inspection (June 21, 2018), we went back to the area where water was seeping and collected a sample for analysis and the presence of fluoride was detected in the water, which confirmed that it was a potable water leak. We then closed the water valve coming into the facility, and after a period of a few minutes, the water stopped seeping from the ground, and then when we opened

the valve after a few minutes water again began seeping out of the ground, so we then knew on which side of the valve to start digging to find the leak.

The leak was located, about fifteen (15) feet away from the edge of the creek at a depth of approximately four (4) feet, near and below the level of the footing for the influent bar screen.

The leak was caused by a longitudinal split in the 2-inch potable water line that services the wastewater treatment plant. The leak was repaired on July 10, 2018. Please see our picture #2, which shows the location of the water leak that was responsible for the water seeping from the ground and our picture #3 which is a picture of the area that was water was seeping from after the leak was identified and repaired.

Picture #1



This is a picture of the pipe that was referenced by Ms. Nautiyal as photo #3 which was discharging water.

Picture #2



This picture shows the location of the leak that was the source of the seeping water referenced by Ms. Nautiyal in photo #8 which was seeping water from multiple locations.

Picture #3



This picture shows the location of the seeping water referenced by Ms. Nautiyal in photo #8 which was seeping water from multiple locations after the leak was located and repaired.

Picture #4



This is a picture of one of the buckets of suspected sludge and potentially contaminated soil and gravel that was removed from Leatherwood Creek during our clean-up of material suspected to be sludge.

ADEQ

ARKANSAS
Department of Environmental Quality

August 3, 2018

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

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

Dear Mr. Dwayne Allen:

The Department has reviewed your response to the inspection conducted at the above reference facility on June 21, 2018. Your response adequately addresses the concerns noted in the Summary of Findings section of the inspection report.

At this time the Department has no further comment concerning this particular inspection. 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 to you and your staff for providing the requested documentation. If I can be of any assistance please feel free to contact me at nautiyal@adeq.state.ar.us or (479)-267-0811, ext. 12.

Sincerely,



Ankush Nautiyal
District 1 Field Inspector
Office of Water Quality