



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

December 30, 2011

Tom Myers, Wastewater Pollution Control Facility Manager
City of Siloam Springs
P.O. Box 80
Siloam Springs, AR 72761

RE: City of Siloam Springs PCI

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

Dear Mr. Myers:

On December 19, 2011, I performed a routine pretreatment compliance inspection of the waste water treatment facility in accordance with the provisions of the Federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, and the regulations promulgated there under. This inspection revealed the following:

The flow meter at Gates Rubber Company has not been in operation since December 6, 2011. According to Ms. Sorum, Health, Safety, Environmental Coordinator, the part has been ordered for the meter and flow is measured manually at the Parshall flume. At the time of the inspection, you were not aware the flow meter was not in operation. I was informed that you would check with other personnel to determine if Gates Rubber Company contacted the City regarding this issue. Please submit a response to the Department indicating if the City was contacted as required by the industry's control document and if enforcement was necessary.

The above item requires your immediate attention. Please submit a written response to this finding to "Water Division Enforcement Branch". The response should be mailed to the address below, or e-mailed to Water-Enforcement-Report@adeq.state.ar.us. This response should contain documentation describing the course of action taken to correct each item noted. You must include color photographs that document your corrective actions. This corrective action should be completed as soon as possible, and the written response with all necessary documentation is due by **January 11, 2012**.

For additional information you may contact the enforcement branch by telephone at 501-682-0639 or by fax at 501-682-0910.

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

Sincerely,

A handwritten signature in black ink that reads "Joy Alison West". The signature is written in a cursive, flowing style.

Alison West
District 1 Field Inspector
Water Division

cc: Water Division Enforcement Branch
 Water Division Permits Branch



Form Approved
OMB No. 2040-0003

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, D.C. 20460

NPDES Compliance Inspection Report

Section A: National Data System Coding

Transaction Code	NPDES	Yr/Mo/Day	Inspec. Type	Inspector	Fac. Type
1 N 2 5 3 A R 0 0 2 0 2 7 3	11 12 1 1 1 2 1 9	17 18 P	19 S	20 1	
Remarks					
A F I N 0 4 - 0 0 1 0 6					
Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
67 69	70 N	71 N	72 N	73	74 75 80

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) Siloam Springs Pollution Control Plant 975 Anderson Avenue Siloam Springs, AR 72761	Entry Time/Date 9:00 a.m./12-19-2011	Permit Effective Date October 1, 2007
	Exit Time/Date 3:35 p.m./12-19-2011	Permit Expiration Date September 30, 2012
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Tom Myers/ Wastewater Pollution Control Facility Manager /479-524-5623/479-524-4653	Other Facility Data PDS#063052	
Name, Address of Responsible Official/Title/Phone and Fax Num Tom Myers/ Wastewater Pollution Control Facility Manager City of Siloam Springs P.O. Box 80 Siloam Springs, AR 72761 479-524-5623/479-524-4653	Contacted Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	

Section C: Areas Evaluated During Inspection

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

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

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

The flow meter at Gates Rubber Company has not been in operation since December 6, 2011. According to Ms. Sorum, HSE Coordinator, the part has been ordered for the meter and flow is measured manually at the Parshall flume. At the time of the inspection, Mr. Myers was not aware the flow meter was not in operation. Mr. Myers stated that he would check with other personnel to determine if Gates Rubber Company contacted the City regarding this issue.

Name(s) and Signature(s) of Inspector(s) <i>Jay Alison West</i>	Agency/Office/Telephone/Fax AR Dept. of Environmental Quality-Fayetteville 479-267-0811, ext. 12/479-267-0819	Date December 19, 2011
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date

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

Name of Municipality: City of Siloam Springs

AFIN Number: 04-00106

NPDES Permit Number(s): AR0020273, AR0020273C, ARR000276

Program Tracked under NPDES Permit Number: AR0020273

Fact Sheet Preparation Date: N/A

Date of Last PCI/Audit: April 23, 2009/June 7-10, 2010

Date of Last Annual Report: August 25, 2011

Name of Inspector: Alison West

Date PCI Performed: December 19, 2011

Name, Title, and Telephone Number of Facility Representative:
Tom Myers, Waste Water Superintendent, 479-524-5623

Name and Title of Other Participants: NA

Number of IUs Visited: 1

Name(s) of IUs Visited: Gates Rubber Company

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

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

Form approved July 1989

B. LOCAL LIMITS

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

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

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

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

4. Have there been any inhibitions or upsets at the POTW (since the last PCI of Audit) which were believed to be caused by industrial discharges? If so, describe the action taken by the City to ensure that the incident would not recur. Were these actions effective?

No

C. INDUSTRIAL USER CONTROL MECHANISM

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

2. How many IU permits (or other control documents) have been issued? 3

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

4. Does the control document contain the following items?

An expiration date: Yes

Discharge limitations: Yes

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

IU self-monitoring requirements: Yes

IU reporting requirements: Yes

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

Sample location: Yes
Type of sample: Yes
Monitoring frequency: Yes
Bypass prohibition: Yes
Right of entry: Yes
Nontransferability: Yes
Revocation clause: Yes
Penalty Provisions: Yes
Slug load notification: Yes
Notification of process change: Yes

D. MONITORING OF IUS BY POTW

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

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

2. **HAS EACH SIU BEEN INSPECTED AND SAMPLED AT THE FREQUENCY REQUIRED BY THE APPROVED PROGRAM?** Yes
3. Are inspections announced or unannounced? Unannounced
4. Are records kept of each inspection? Yes
5. Does the inspection report contain an adequate description of the following: Reviewed Cobb Vantress
- Date and time of inspection: Yes
- Officials present: Yes
- Inspection of chemical storage areas: Yes
- Description of regulated processes, categorical waste streams, and discharge location of these waste streams: Yes
- Inspection of the pretreatment facilities: NA
- Review of self-monitoring records: Yes
- Observation of IU self-monitoring procedures: NA
- Verification that approved analytical techniques are used: Yes
- Verification of IU flow measurement (where required): Yes
6. Overall adequacy of inspection documentation: Satisfactory
-

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

8. Are analyses performed in accordance with EPA-approved methods (40 CFR 136)? Yes

9. Are sampling and flow monitoring equipment properly maintained? Contract lab samples industries.

10. Is the POTW keeping proper field notes and chain of custody forms? Yes

11. Is the sampling location representative of the discharge to the collection system? Yes

12. Are sampling locations identified in POTW records? Yes

13. Are sampling services available in an emergency? Yes

14. What are the POTW's procedures for tracking receipt and review of IU reports, such as BMR's, semi-annual reports, progress reports, bypass reports, and self-monitoring reports? Reports are reviewed by the pretreatment compliance officer.

15. ARE SELF-MONITORING REPORTS REVIEWED TO VERIFY THAT ANALYSES WERE PERFORMED FOR ALL REGULATED PARAMETERS, AND TO EVALUATE COMPLIANCE WITH EFFLUENT LIMITS? Yes

16. IF VIOLATIONS ARE FOUND IN REPORTS, DOES THE POTW RESPOND TO ALL VIOLATIONS? Yes

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

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

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

Name and address: N/A

Other environmental permits held: N/A

Description of operations: N/A

Process flow diagrams: N/A

Flow measurements: N/A

Measurements of regulated pollutants: N/A

Certification of compliance by the IU: N/A

Compliance schedule (if needed): N/A

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

5. Comments on the POTW's enforcement procedures:
Enforcement response procedures appear to be adequate.

F. POTW'S PRETREATMENT ORGANIZATION STRUCTURE

1. Is the program structure essentially the same as that presented in the approved pretreatment program? Yes
2. Are staffing levels adequate? Yes
3. Are the responsible officials familiar with the approved program? Yes

G. MULTIJURISDICTIONAL ISSUES

1. List any IUs which are located outside of the jurisdictional area of the POTW:
None
2. Does the POTW have adequate procedures for controlling IUs located outside its jurisdictional area? N/A
3. Does the POTW have copies of permits for IUs in other cities? N/A
4. Have any of these IUs met the criteria for Significant Violator? If so, have they been published by the POTW in its annual list of Significant Violators? N/A
5. Comments on multijurisdictional issues: None

H. EVALUATION AND COMMENTS

The flow meter at Gates Rubber Company has not been in operation since December 6, 2011. According to Ms. Sorum, Health, Safety, Environmental Coordinator, the part has been ordered for the meter and flow is measured manually at the Parshall flume. At the time of the inspection, Mr. Myers was not aware the flow meter was not in operation. Mr. Myers stated that he would check with other personnel to determine if Gates Rubber Company contacted the City regarding this issue. Please submit a response to the Department indicating if the City was contacted as required by the industry's control document and if enforcement was necessary.

The City of Siloam Springs has included a Fats/Oil and Grease Ordinance.

Simmons Foods no longer operates the kill plant.

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Gates Rubber Company

POTW Name: City of Siloam Springs

Industry Contacts: Contessa Sorum, Health, Safety, Environmental Coordinator

Date and Time of Visit: 12-19-2011 p.m./2:00-2:34 p.m.

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

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

Categorical Industry? Yes

Basis for Limits: Categorical standards and local ordinance

Point of Application: End of discharge pipe

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

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

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

PPETS CODE SHEET

PRETREATMENT COMPLIANCE INSPECTION (PCI)

		CODE
INSPECTOR'S NAME:	<u>Alison West</u>	
NAME OF FACILITY:	<u>City of Siloam Springs</u>	
PERMIT NUMBER USED TO TRACK PROGRAM:	<u>AR0020273</u>	NPID
DATE OF PCI:	<u>December 19, 2011</u>	DTIA

PPETS WENDB DATA ELEMENTS

NUMBER OF SIGNIFICANT IUS (SIUS):	<u>3</u>	SIUS
NUMBER OF CATEGORICAL IUS:	<u>1</u>	CIUS
SIUS NOT SAMPLED OR INSPECTED BY POTW:	<u>0</u>	NOIN
SIUS WITHOUT CONTROL MECHANISM:	<u>0</u>	NOCM
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH STANDARDS OR REPORTING:	<u>0</u>	PSNC
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH SELF-MONITORING REQUIREMENTS:	<u>0</u>	MSNC
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH SELF-MONITORING AND NOT INSPECTED OR SAMPLED BY POTW:	<u>0</u>	SNIN