



**DIVISION OF
ENVIRONMENTAL
QUALITY**

Sarah Huckabee Sanders
GOVERNOR

Shane E. Khoury
SECRETARY

July 30, 2024

J Allan Gilbert, City Administrator
City of Siloam Springs
P.O. Box 80 400 Broadway
Siloam Springs, AR 72761
Email Address: agilbert@siloamsprings.com

RE: City of Siloam Springs Inspection – PDS# 131026 (Benton Co.)
AFIN: 04-00106 Permit No.: AR0020273

Dear Mr. Gilbert:

On July 9, 2024, 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 inspection report and provide a written response for each item that was noted. This response should be mailed to the attention of the Office of Water Quality Compliance Branch at the address below my signature or emailed to Water-Inspection-Report@adeq.state.ar.us. This response should contain documentation describing the course of action taken to correct each item noted. The corrective action(s) should be completed as soon as possible and the written response with all necessary documentation (i.e. photos) is due by **August 14, 2024**.

If I can be of any assistance, please contact me at William.Cody@adeq.state.ar.us or (501) 944-2569.

Sincerely,

A handwritten signature in blue ink that reads "Will Cody".

William Cody
Inspector, Office of Water Quality

Cc: abrown@siloamsprings.com

 ENVIRONMENTAL QUALITY	OFFICE OF WATER QUALITY INSPECTION REPORT		
	AFIN: 04-00106 PERMIT #: AR0020273		DATE: 7/9/2024
	COUNTY: 04 Benton	PDS #: 131026	MEDIA: WN
	GPS LAT: 36.192823 LONG: -94.563199 LOCATION: Entrance		
FACILITY INFORMATION		INSPECTION INFORMATION	
NAME: City of Siloam Springs LOCATION: 975 Anderson Avenue CITY: Siloam Springs		FACILITY TYPE: 1 - Municipal INSPECTOR ID#: 142257 S - State	
		FACILITY EVALUATION RATING: *** INSPECTION TYPE: Compliance Evaluation	
		DATE(S): 7/9/2024 ENTRY TIME: 08:57 EXIT TIME: 10:01	
		PERMIT EFFECTIVE DATE: 10/1/2007 PERMIT EXPIRATION DATE: 9/30/2099	
RESPONSIBLE OFFICIAL			
NAME / TITLE: J Allan Gilbert / City Administrator COMPANY: City of Siloam Springs MAILING ADDRESS: P.O. Box 80 400 Broadway CITY, STATE, ZIP: Siloam Springs AR 72761 PHONE & EXT. / FAX: 479-524-5623 / EMAIL: agilbert@siloamsprings.com		FAYETTEVILLE SHALE RELATED: N FAYETTEVILLE SHALE VIOLATIONS: N	
CONTACTED DURING INSPECTION: No		INSPECTION PARTICIPANTS NAME/TITLE/PHONE/FAX/EMAIL/ETC.: Tony Brown, Wastewater Superintendent - Class IV, City of Siloam Springs, (479) 228-2000, abrown@siloamsprings.com Austin Hawes, DEQ Area 1 Inspector, (501) 837-6910, austin.hawes@adeq.state.ar.us William Cody, DEQ Area 1 Inspector, (501) 944-2569, william.cody@adeq.state.ar.us	
AREA EVALUATIONS (S=Satisfactory, M=Marginal, U=Unsatisfactory, N=Not Applicable/Evaluated)			
S	PERMIT	S	FLOW MEASUREMENT
S	RECORDS/REPORTS	S	LABORATORY
M	OPERATION & MAINTENANCE	S	EFFLUENT/RECEIVING WATER
S	SAMPLING	S	SLUDGE HANDLING/DISPOSAL
S	OTHER: No Exposure	N	STORMWATER
		S	FACILITY SITE REVIEW
		N	SELF-MONITORING PROGRAM
		N	PRETREATMENT

SUMMARY OF FINDINGS

The following items were noted during the inspection and require a response:

In accordance with Part II, B.1.a. of the permit:

1. There is moderate build-up of influent rags/screenings at the influent bar screen. It is requested that this build-up be kept to a minimum to ensure proper operation and maintenance.
2. There are cracks in the concrete at the influent flume/bar screen. It is requested that an update be provided once plans are established to have this remediated in the headworks upgrade.

GENERAL COMMENTS

On July 9, 2024, DEQ Area 1 Inspector Austin Hawes and I conducted a Compliance Evaluation Inspection at the above-referenced facility. Mr. Tony Brown, Plant Superintendent and Pretreatment Coordinator for the City of Siloam Springs, accompanied us during the inspection. The inspection consisted of a records review and site assessment.

Records Review:

All records provided are adequately maintained and completed. Mr. Brown thoroughly explained all records reviewed during the inspection and ensures that the records are retained. There are no additional comments in regard to the records review.

Site Assessment:

The facility is currently planning to redesign the headworks with an approximate start date of early 2025. The facility will be working with McClelland Consulting Engineers and Garney Construction. There is a moderate build-up of rags/solids at the influent bar screen before the grit removal area. Rags and other solids are loaded into a wheel barrow and placed in a dumpster. It appears that the excess build-up of rags and solids have potential to fall over the top of the concrete and be placed on the ground. It is requested that the bar screen materials be adequately cleaned up and removed. There are cracks in the concrete near the influent bar screen, which Mr. Brown mentioned they already have plans to remediate this with the headworks upgrade.

The facility utilizes centrifugal blowers to provide air to the Biological Nutrient Removal (BNR) treatment. There are two anaerobic zones, three anoxic zones, an aeration zone, and the ability to re-introduce wastewater into this treatment process to get ammonia and phosphorous numbers down. There are two additional sections of the BNR that are currently out of operation; however, only the one operating section is adequate for treatment. Following the BNR is a splitter box that includes Aluminum Chlorohydrate, and the wastewater can be sent to either of two final clarifiers. There is also a Return Activated Sludge and Waste Activated Sludge pipe at the splitter box where RAS can be returned to the system and WAS can be wasted. The final clarifiers utilize surface sprayers and has covers over the v-notch weirs to prohibit algae growth.

The facility utilizes chlorination and de-chlorination chambers following the final clarifiers before discharging through Outfall 001. There is minor vegetative growth in the chlorination/de-chlorination chamber; however, it does not appear that this impacts the final effluent. The outfall is clear of debris and has a clear, clean discharge.

The in-house laboratory did not reveal any items of significance. All calibration logs are adequate and records are thoroughly maintained.

INSPECTOR'S SIGNATURE:  William Cody	DATE: 7/22/2024
SUPERVISOR'S SIGNATURE:  Amy Huneycutt	DATE: 7/29/2024

SECTION A: PERMIT VERIFICATION	
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS	☒ S ☐ M ☐ U ☐ NA ☐ NE
DETAILS:	
1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE:	☒ Y ☐ N ☐ NA ☐ NE
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES:	☐ Y ☐ N ☐ NA ☒ NE
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT:	☒ Y ☐ N ☐ NA ☐ NE
4. ALL DISCHARGES ARE PERMITTED:	☒ Y ☐ N ☐ NA ☐ NE
SECTION B: RECORDKEEPING AND REPORTING EVALUATION	
RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT	☒ S ☐ M ☐ U ☐ NA ☐ NE
DETAILS:	
1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS:	☒ Y ☐ N ☐ NA ☐ NE
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE:	☒ S ☐ M ☐ U ☐ NA ☐ NE
a. DATES AND TIME(S) OF SAMPLING:	☒ Y ☐ N ☐ NA ☐ NE
b. EXACT LOCATION(S) OF SAMPLING:	☒ Y ☐ N ☐ NA ☐ NE
c. NAME OF INDIVIDUAL PERFORMING SAMPLING:	☒ Y ☐ N ☐ NA ☐ NE
d. ANALYTICAL METHODS AND TECHNIQUES:	☒ Y ☐ N ☐ NA ☐ NE
e. RESULTS OF CALIBRATIONS:	☒ Y ☐ N ☐ NA ☐ NE
f. RESULTS OF ANALYSES:	☒ Y ☐ N ☐ NA ☐ NE
g. DATES AND TIMES OF ANALYSES:	☒ Y ☐ N ☐ NA ☐ NE
h. NAME OF PERSON(S) PERFORMING ANALYSES:	☒ Y ☐ N ☐ NA ☐ NE
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE:	☒ S ☐ M ☐ U ☐ NA ☐ NE
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR:	☒ S ☐ M ☐ U ☐ NA ☐ NE
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA:	☒ Y ☐ N ☐ NA ☐ NE
SECTION C: OPERATIONS AND MAINTENANCE	
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED	☒ S ☐ M ☐ U ☐ NA ☐ NE
DETAILS:	
1. TREATMENT UNITS PROPERLY OPERATED:	☒ S ☐ M ☐ U ☐ NA ☐ NE
2. TREATMENT UNITS PROPERLY MAINTAINED:	☒ S ☐ M ☐ U ☐ NA ☐ NE
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED:	☒ S ☐ M ☐ U ☐ NA ☐ NE
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE:	☒ S ☐ M ☐ U ☐ NA ☐ NE
5. ALL NEEDED TREATMENT UNITS IN SERVICE:	☒ S ☐ M ☐ U ☐ NA ☐ NE
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED:	☒ S ☐ M ☐ U ☐ NA ☐ NE
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED:	☒ S ☐ M ☐ U ☐ NA ☐ NE
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE:	☒ Y ☐ N ☐ NA ☐ NE
9. STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED:	☒ Y ☐ N ☐ NA ☐ NE
10. PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED:	☒ Y ☐ N ☐ NA ☐ NE
11. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR:	☒ Y ☐ N ☐ NA ☐ NE
12. IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED:	☒ Y ☐ N ☐ NA ☐ NE
13. HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS:	☒ Y ☐ N ☐ NA ☐ NE
14. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT: <u>May '24 – 8" of rain, have an EQ basin if need to divert any water.</u>	☒ Y ☐ N ☐ NA ☐ NE
15. IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT:	☐ Y ☒ N ☐ NA ☐ NE

SECTION D: SAMPLING	
PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS	☒ S ☐ M ☐ U ☐ NA ☐ NE
DETAILS:	
1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT:	☒ Y ☐ N ☐ NA ☐ NE
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES:	☒ Y ☐ N ☐ NA ☐ NE
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT:	☐ Y ☐ N ☐ NA ☒ NE
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT:	☒ Y ☐ N ☐ NA ☐ NE
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT:	☒ Y ☐ N ☐ NA ☐ NE
6. SAMPLE COLLECTION PROCEDURES ADEQUATE:	☒ Y ☐ N ☐ NA ☐ NE
a. SAMPLES REFRIGERATED DURING COMPOSITING:	☒ Y ☐ N ☐ NA ☐ NE
b. PROPER PRESERVATION TECHNIQUES USED:	☒ Y ☐ N ☐ NA ☐ NE
c. CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136:	☒ Y ☐ N ☐ NA ☐ NE
7. IF MONITORING IS PERFORMED MORE OFTEN THAN REQUIRED ARE RESULTS REPORTED ON THE DMR:	☐ Y ☐ N ☐ NA ☒ NE
SECTION E: FLOW MEASUREMENT	
PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS	☒ S ☐ M ☐ U ☐ NA ☐ NE
DETAILS:	
1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: <u>5 ft.</u> TYPE OF DEVICE: <u>Weir w/out contractions</u>	☒ Y ☐ N ☐ NA ☐ NE
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED:	☒ Y ☐ N ☐ NA ☐ NE
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED: <u>ISCO Ultrasonic Transmitter</u>	☒ Y ☐ N ☐ NA ☐ NE
4. CALIBRATION FREQUENCY ADEQUATE:	☒ Y ☐ N ☐ NA ☐ NE
5. RECORDS MAINTAINED OF CALIBRATION PROCEDURES:	☒ Y ☐ N ☐ NA ☐ NE
6. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE:	☒ Y ☐ N ☐ NA ☐ NE
7. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE:	☒ Y ☐ N ☐ NA ☐ NE
8. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES:	☒ Y ☐ N ☐ NA ☐ NE
9. HEAD MEASURED AT PROPER LOCATION:	☒ Y ☐ N ☐ NA ☐ NE
SECTION F: LABORATORY	
PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS	☒ S ☐ M ☐ U ☐ NA ☐ NE
DETAILS:	
1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(B) FOR SLUDGES) :	☒ Y ☐ N ☐ NA ☐ NE
2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED:	☐ Y ☐ N ☐ NA ☒ NE
3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT:	☒ Y ☐ N ☐ NA ☐ NE
4. QUALITY CONTROL PROCEDURES ADEQUATE:	☒ Y ☐ N ☐ NA ☐ NE
5. DUPLICATE SAMPLES ARE ANALYZED $\geq 10\%$ OF THE TIME:	☒ Y ☐ N ☐ NA ☐ NE
6. SPIKED SAMPLES ARE ANALYZED $\geq 10\%$ OF THE TIME:	☒ Y ☐ N ☐ NA ☐ NE
7. COMMERCIAL LABORATORY USED:	☒ Y ☐ N ☐ NA ☐ NE
a. LAB NAME: <u>Environmental Testing Group, Inc.</u>	
b. LAB ADDRESS: <u>1702 East Central Avenue Suite 10, Bentonville, AR 72712</u>	
c. PARAMETERS PERFORMED: <u>NH₃; CBOD; TSS; TP; Nitrate as N;</u>	
8. BIOMONITORING PROCEDURES ADEQUATE:	☐ Y ☐ N ☐ NA ☒ NE
a. PROPER ORGANISMS USED:	☐ Y ☐ N ☐ NA ☒ NE
b. PROPER DILUTION SERIES FOLLOWED:	☐ Y ☐ N ☐ NA ☒ NE
c. PROPER TEST METHODS AND DURATION:	☐ Y ☐ N ☐ NA ☒ NE
d. RETESTS AND/OR TRE PERFORMED AS REQUIRED:	☐ Y ☐ N ☐ NA ☒ NE

SECTION G: EFFLUENT/RECEIVING WATERS OBSERVATIONS							
BASED ON VISUAL OBSERVATIONS ONLY						☒ S ☐ M ☐ U ☐ NA ☐ NE	
DETAILS:							
OUTFALL #:	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	COLOR	OTHER
001	None	None	None	None	None	Clear	--
SECTION H: SLUDGE DISPOSAL							
SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS						☒ S ☐ M ☐ U ☐ NA ☐ NE	
DETAILS:							
1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY:						☒ S ☐ M ☐ U ☐ NA ☐ NE	
2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503:						☒ S ☐ M ☐ U ☐ NA ☐ NE	
3. FOR LAND APPLIED SLUDGE, TYPE OF LAND APPLIED TO: (E.G., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE):							
SECTION I: SAMPLING INSPECTION PROCEDURES							
SAMPLE RESULTS WITHIN PERMIT REQUIREMENTS						☐ S ☐ M ☐ U ☒ NA ☐ NE	
DETAILS:							
1. SAMPLES OBTAINED THIS INSPECTION:						☐ Y ☐ N ☒ NA ☐ NE	
2. TYPE OF SAMPLE: ☐ GRAB:___ ☐ COMPOSITE:___ METHOD:___ FREQUENCY:___							
3. SAMPLES PRESERVED:						☐ Y ☐ N ☒ NA ☐ NE	
4. FLOW PROPORTIONED SAMPLES OBTAINED:						☐ Y ☐ N ☒ NA ☐ NE	
5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE:						☐ Y ☐ N ☒ NA ☐ NE	
6. SAMPLE REPRESENTATIVE OF VOLUME AND NATURE OF DISCHARGE:						☐ Y ☐ N ☒ NA ☐ NE	
7. SAMPLE SPLIT WITH PERMITTEE:						☐ Y ☐ N ☒ NA ☐ NE	
8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED:						☐ Y ☐ N ☒ NA ☐ NE	
9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT:						☐ Y ☐ N ☒ NA ☐ NE	
SECTION J: STORM WATER POLLUTION PREVENTION PLAN							
STORM WATER MANAGEMENT MEETS PERMIT REQUIREMENTS						☐ S ☐ M ☐ U ☐ NA ☒ NE	
DETAILS:							
1. SWPPP UPDATED AS NEEDED:___ DATE OF LAST UPDATE:___						☐ Y ☐ N ☐ NA ☒ NE	
2. SITE MAP INCLUDING ALL DISCHARGES AND SURFACE WATERS:						☐ Y ☐ N ☐ NA ☒ NE	
3. POLLUTION PREVENTION TEAM IDENTIFIED:						☐ Y ☐ N ☐ NA ☒ NE	
4. POLLUTION PREVENTION TEAM PROPERLY TRAINED:						☐ Y ☐ N ☐ NA ☒ NE	
5. LIST OF POTENTIAL POLLUTANT SOURCES:						☐ Y ☐ N ☐ NA ☒ NE	
6. LIST OF POTENTIAL SOURCES AND PAST SPILLS AND LEAKS:						☐ Y ☐ N ☐ NA ☒ NE	
7. ALL NON-STORM WATER DISCHARGES ARE AUTHORIZED:						☐ Y ☐ N ☐ NA ☒ NE	
8. LIST OF STRUCTURAL BMPS:						☐ Y ☐ N ☐ NA ☒ NE	
9. LIST OF NON-STRUCTURAL BMPS:						☐ Y ☐ N ☐ NA ☒ NE	
10. BMPS PROPERLY OPERATED AND MAINTAINED:						☐ Y ☐ N ☐ NA ☒ NE	
11. INSPECTIONS CONDUCTED AS REQUIRED:						☐ Y ☐ N ☐ NA ☒ NE	

FLOW CALCULATION SHEET

Date:	7/9/24	Time:	9:35		
Head in Inches:	5.808	Feet:	0.484		
Type & Size of Primary Flow Measurement Device: 5' Weir without end contractions					
Name & Model of Secondary Flow Measurement Device:				ISCO Ultrasonic Transmitter	
Date of last Calibration of Secondary Flow Device:				February 2024	
Recorded Flow at Date & Time Listed Above:			2513.41 GPM	(Facility Flow Meter)	
Calculated Flow at Date & Time Listed Above:			2485 GPM		
(Flow is calculated using flow charts in: <u>ISCO Open Channel Flow Measurement Handbook-5th Edition</u>)					
% Error =	Recorded Value	-	Calculated Value	X 100	
	Calculated Value				
% Error =	2513.41	-	2485	X 100	
	2485				
% Error =	28.41	X 100			
	2485				
% Error =	0.0114326	X 100			
% Error =	1.14	%			
Comments:					

DMR Calculation Check

Reporting Period: From 2023 02 01 To 2023 02 28
 Year Month Day Year Month Day

Parameter Checked: TSS

	Loading Mass Mo. Avg. - lbs/day	Concentration Monthly Mo. Avg. - mg/l	7-day Avg. - mg/l
Reported Value:	<u>143.8</u>	<u>2.9</u>	<u>2.9</u>
Calculated Value:	<u>143.8</u>	<u>2.9</u>	<u>5.2</u>
Permit Value:	<u>550</u>	<u>20</u>	<u>30</u>

If calculated value does not equal reported value, explain:

The ETG Analytical Report for sampling period of Effluent, Outfall 001 2/14/23-2/15/2023 revealed a Total Suspended Solids result of 5.20 mg/L. This is the highest value of TSS for February 2023, which should be reported as the 7-day average.

DMR Calculation Check

Reporting Period:	From	<u>2023</u>	<u>11</u>	<u>01</u>	To	<u>2023</u>	<u>11</u>	<u>30</u>
		Year	Month	Day		Year	Month	Day

Parameter Checked: CBOD5

Loading Mass Mo. Avg. - lbs/day	Concentration Monthly Mo. Avg. - mg/l	7-day Avg. - mg/l
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Reported Value:	<u>154.5</u>	<u>3.0</u>	<u>3.0</u>
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Calculated Value:	154.5	3.0	3.0
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Permit Value:	550	15	22.5
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If calculated value does not equal reported value, explain:

Office of Water Quality Photographic Evidence Sheet			
Location:	City of Siloam Springs		
Photographer:	William Cody	Date:	7/9/2024
Witness:	Tony Brown, Austin Hawes	Time:	09:09
		Photo #:	1
Description:	Facility headworks – planning for upgrade to start by the beginning of next year.		
			
Photographer:	William Cody	Date:	7/9/2024
Witness:	Tony Brown, Austin Hawes	Time:	09:09
		Photo #:	2
Description:	One section of cracked concrete at the influent bar screen area.		
			

Office of Water Quality Photographic Evidence Sheet			
Location:	City of Siloam Springs		
Photographer:	William Cody	Date:	7/9/2024
Witness:	Tony Brown, Austin Hawes	Time:	09:09
		Photo #:	3
Description:	Influent bar screen with build-up of screenings/other material.		
			
Photographer:	William Cody	Date:	7/9/2024
Witness:	Tony Brown, Austin Hawes	Time:	09:09
		Photo #:	4
Description:	Grit chamber area not in operation.		
			

Office of Water Quality Photographic Evidence Sheet					
Location:	City of Siloam Springs				
Photographer:	William Cody	Date:	7/9/2024	Time:	09:16
Witness:	Tony Brown, Austin Hawes			Photo #:	5
Description:	BNR treatment process – one of three cells, this is the only in operation currently.				
					
Photographer:	William Cody	Date:	7/9/2024	Time:	09:18
Witness:	Tony Brown, Austin Hawes			Photo #:	6
Description:	Additional view of the BNR – aeration zone.				
					

Office of Water Quality Photographic Evidence Sheet			
Location:	City of Siloam Springs		
Photographer:	William Cody	Date:	7/9/2024
Witness:	Tony Brown, Austin Hawes	Time:	09:21
Photo #:	7		
Description:	One of two final clarifiers with surface sprayers and covers over the v-notch weirs.		
			
Photographer:	William Cody	Date:	7/9/2024
Witness:	Tony Brown, Austin Hawes	Time:	09:28
Photo #:	8		
Description:	Chlorine contact chamber with de-chlorination.		
			

Office of Water Quality Photographic Evidence Sheet			
Location:	City of Siloam Springs		
Photographer:	William Cody	Date:	7/9/2024
Witness:	Tony Brown, Austin Hawes	Time:	09:35
		Photo #:	9
Description:	Location of flow meter and manual flow reading.		



Photographer:	William Cody	Date:	7/9/2024	Time:	09:12
Witness:	Tony Brown, Austin Hawes			Photo #:	10
Description:	Solids handling belt feed press.				



Office of Water Quality Photographic Evidence Sheet			
Location:	City of Siloam Springs		
Photographer:	William Cody	Date:	7/9/2024
Witness:	Tony Brown, Austin Hawes	Time:	09:30
		Photo #:	11
Description:	Outfall 001.		
			



Attachment 1. Google Earth satellite imagery of the City of Siloam Springs Wastewater Treatment Facility.

From: William Cody (adpce.ad)
Sent: Monday, August 5, 2024 1:02 PM
To: Uniqika Marshall (adpce.ad)
Subject: FW: Response to "Summary of Findings" City of Siloam Springs (AR0020273) Inspection
Attachments: Response to CEI Inspection July 9 2024.pdf

Uniqika,

Here is a response I received from the City of Siloam Springs for PDS# 131026. I've just submitted an adequate response letter to your folder for this.

Thank you,

William Cody | Area 1 Inspector
Division of Environmental Quality | Office of Water Quality
1011 NW J. Street | Bentonville, AR 72712
c: [501.944.2569](tel:501.944.2569) | e: William.Cody@arkansas.gov



ARKANSAS
ENERGY & ENVIRONMENT

From: Anthony Brown <abrown@siloamsprings.com>
Sent: Friday, August 2, 2024 1:39 PM
To: Wastewater-Inspection-Report@adeq.state.ar.us
Cc: William Cody (adpce.ad) <William.Cody@adeq.state.ar.us>; austin.hawes@adeq.state.ar.us; Allan Gilbert <agilbert@siloamsprings.com>; Steven Gorszcyk <sgorszcyk@siloamsprings.com>
Subject: Response to "Summary of Findings" City of Siloam Springs (AR0020273) Inspection

Dear State Representatives,

Please find attached, the response to the "Summary of Findings", for the July 9, 2024, Compliance Evaluation Inspection conducted on July 9, 2024. All items have been addressed in accordance with Part II, B.1.a. of the permit. If I can be of any further assistance, please let me know.

Respectfully,

Tony Brown

Wastewater Superintendent

Pretreatment Coordinator

975 Anderson Avenue, Siloam Springs, AR 72761

Plant: 479-524-5623

Cell: 479-228-2000

abrown@siloamsprings.com





August 2, 2024

Via Email: Wastewater-Inspection-Report@adeq.state.ar.us

Water Division Inspection Branch
Arkansas Department of Environmental Quality
5301 North Shore Drive
North Little Rock, AR 72118-5317

RE: Siloam Springs Wastewater Treatment Facility
AFIN: 04-00106 Permit No.: AR0020273

CITY OF SILOAM SPRINGS
RESPONSE TO ADEQ INSPECTION REPORT (July 9, 2024)

The Arkansas Department of Environmental Quality ("ADEQ" or "the Department") conducted an inspection of the City of Siloam Springs ("the City") wastewater treatment facility ("WWTF") on July 9, 2024. The Department submitted its findings from the inspection in a report ("Inspection Report") to the City dated July 30, 2024, which the City received on July 30, 2024. The Inspection Report contains a list of the Summary of Findings. The Inspection Report requests a written response to Summary of Findings by August 14, 2024. This letter is intended to respond to each item(s) contained in the July 30, 2024, Inspection Report.

SUMMARY OF FINDINGS

The following items were noted during the inspection and require a response:

In accordance with Part II, B.1.a. of the permit:

1. There is moderate build-up of influent rag/screenings at the influent bar screen. It is requested that this build-up be kept to a minimum to ensure proper operation and maintenance.
2. There are cracks in the concrete at the influent flume/bar screen. It is requested that an update be provided once plans are established to have this remediated in the headworks upgrade.

RESPONSES TO SUMMARY OF FINDINGS

1. The City of Siloam Springs wastewater staff remove rags/non-dispersible materials daily from the bar screen. Once enough material is collected and dewatered the materials are disposed of in a dumpster. During the inspection, the rags/non-dispersible materials had not adequately been dewatered and therefore were not removed.

Please see attached picture of the bar screen where wastewater staff has removed rags/non-dispersible materials.

2. As mentioned during the inspection, the City of Siloam Springs is working with McClelland Consulting Engineers, Inc. (MCE), and Garney Construction to redesign the headworks to include a new influent pipe to replace the current open Parshall flume design. The target start date is set for 2025, and when final plans/drawing are approved an update will be provided to the Arkansas Department of Energy and Environment.

If you have any questions or need additional information, please do not hesitate to contact me at 479-228-2000 or abrown@siloomsprings.com

Respectfully submitted,



Tony Brown
Wastewater Superintendent/Pretreatment Coordinator
Tel: (479) 524-5623
975 Anderson Avenue
Siloam Springs, AR 72761

cc: Alan Gilbert, City Administrator
Steve Gorszczyk, Public Works Director
William Cody, DEQ Area 1 Inspector
Austin Hawes, DEQ Area 1 Inspector

City of Siloam Springs Wastewater Plant Bar Screen





DIVISION OF ENVIRONMENTAL QUALITY

Sarah Huckabee Sanders
GOVERNOR

Shane E. Khoury
SECRETARY

August 5, 2024

Tony Brown, Wastewater Superintendent/Pretreatment Coordinator
City of Siloam Springs
975 Anderson Avenue
Siloam Springs, AR 72761
Email Address: abrown@siloamsprings.com

RE: Adequate Response to City of Siloam Springs Inspection – PDS# 131026 (Benton County)
AFIN: 04-00106 Permit No.: AR0020273

Dear Mr. Brown:

I have reviewed the response pertaining to my inspection of the Siloam Springs Wastewater Treatment Facility. The information provided sufficiently addresses the items referenced in my inspection report. At this time, the Division has no further comment concerning this inspection. Acceptance of this response by the Division does not preclude any future enforcement action deemed necessary at this site or any other site.

If I require further information concerning this matter, I will contact you. Thank you for your attention to this matter. Should you have any questions please contact me at (501) 944-2569 or you may email me at William.Cody@arkansas.gov.

Sincerely,

A handwritten signature in blue ink that reads 'Will Cody'.

William Cody
Inspector, Office of Water Quality