



ARKANSAS  
Department of Environmental Quality

October 17, 2008

Kirby Massey, Mayor  
City of Sunset  
300 John H. Johnson Blvd.  
Sunset, AR 72364

RE: City of Sunset Waste Water Collection System

AFIN: 18-00427

NPDES Permit No.: Satellite of AR0021971

Dear Mr. Massey:

On September 11 & 17, and October 1 & 6, 2008, I performed an inspection of the waste water collection system in accordance with the provisions of the Federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, and the regulations promulgated thereunder. These inspections were conducted in response to complaints alleging the system was malfunctioning and revealed the following violations:

- 1. During the two September inspections, there was evidence of a recent overflow from a manhole behind the Harvard One Apartments (4612 – I-55). During both October inspections, this manhole was observed to be actively overflowing. This is an unpermitted discharge violating Arkansas Water and Air Pollution Control Act 8-4-217(b)(1)(E). Additionally placing or causing to be placed any sewage or other wastes in a location where it is likely to cause pollution of any waters of this state is a violation of Arkansas Water and Air Pollution Control Act 8-4-217(a)(2).**
  
- 2. The two pump stations operated by the City of Sunset were not being properly operated and maintained. The following items were noted:**
  - a. There was only one working pump at each pump station and neither was being properly maintained.**
  - b. The electrical connections and devices such as circuit breakers and motor starters were exposed at the Harvard St. pump station.**
  - c. There were multiple leaks from the discharge pipe at the Harvard St. pump station.**
  - d. There was inadequate lighting in both pump stations to allow operators to adequately inspect and maintain equipment.**
  - e. The electrical controls at the Harvard St. pump station had been bypassed. A stick held in place by the control panel door and a bungee cord was being used to energize the motor starter.**

- f. **The drive belt on the pump at the City Hall pump station was slipping. The drive pulleys were designed for using two belts, however only one was installed.**
  - g. **There was an extensive accumulation of solids at both pump stations that appeared to interfering with the flow and pumping of waste water.**
  - h. **There were no alarms or other such notification devices in use at either pump station to indicate malfunctions.**
  - i. **There were no grates or covers over the wet wells at either pump station, thus creating a fall/drowning hazard.**
  - j. **There were no guards around pulleys and belts at either pump station to prevent accidental contact with moving parts.**
  - k. **The pump stations were not secured to prevent entry and potential injury of unauthorized personnel. The latches on the chain link gates were loose allowing the locks to be bypassed.**
  - l. **There was inadequate ventilation at both pump stations resulting in the accumulation of excessive heat and toxic fumes.**
- 3. Not continuing to comply with the requirements agreed upon in the Consent Administrative Order (2000-02) issued January 4, 2000 and Amendment Number One (2000-02-001) issued June 6, 2001.**

The above items require your immediate attention. Please submit a written response to these findings to the Water Division Enforcement Branch of this Department at the following address:

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

This response should contain detailed documentation describing the course of action taken to correct the items noted. This corrective action should be completed as soon as possible, and in no case later than the following dates.

**Provide the following by October 24, 2008:**

- 1. A written response certifying that all pump stations are working, all blockages have been removed and the collection system is functioning properly.**
- 2. The name, address and phone number of the person responsible for maintaining the collection system.**
- 3. Documentation indicating that all wastes (both liquids and solids) discharged to the surface of the ground have been removed and properly disposed.**
- 4. Documentation indicating that all areas contaminated with wastes have been adequately cleaned and disinfected.**

«Cognizant\_Official», «Facility\_Name»

October 17, 2008

Page 3

**Provide the following by November 7, 2008:**

- 1. A legible map of the entire collection system showing the location of all manholes, the direction of flow and all pump stations.**
- 2. Information on all pump stations including the number of operational pumps, rated capacity, type of alarms installed and any auxiliary/backup power.**
- 3. Certification that the entire collection system has been thoroughly evaluated by qualified personnel and is functioning properly and is being properly maintained.**
- 4. Certification that all residents have been provided with a contact person for reporting overflows, backups or other wastewater problems.**
- 5. Documentation that describes the procedures that will be followed to ensure that the duration and impact of all future collection system problems will be minimized.**

**Please be advised that ALL OVERFLOWS regardless of size must be reported to the NPDES Enforcement Section of this Department (501-682-0640) within 24 hours of you (or your staff) becoming aware of the overflow.**

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 [walker@adeq.state.ar.us](mailto:walker@adeq.state.ar.us) or 870-935-7221 ext.-12.

Sincerely,



Brent L. Walker  
District 3 Field Inspector  
Water Division

cc: Water Division Enforcement Branch  
Water Division Permits Branch  
Frank Fogleman – Mayor, City of Marion, P.O. Box 717, Marion, AR 72364  
Rex and Ann Rogers, Harvard One Apartments, P.O. Box 105, Marion, AR 72364  
Clyde L. Little, [Clyde.Little@arkansas.gov](mailto:Clyde.Little@arkansas.gov), Arkansas Department of Health



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

## NPDES Compliance Inspection Report

Form Approved  
OMB No. 2040-0003

### 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 [1][9][7][1] 11 12 [0][8][0][9][1][1] 17 18 [V] 19 [S] 20 [1]					
Remarks					
Inspection Work Days: 67 [ ] [ ] [ ] 69 Facility Evaluation Rating: 70 [N] BI: 71 [N] QA: 72 [N] 73 [ ] [ ] 74 75 [ ] [ ] [ ] [ ] 80 -----Reserved-----					

### Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) <b>City of Sunset – Satellite of Marion AR0021971</b> <b>Sunset, AR</b> <b>Crittenden Co.</b>	Entry Time/Date <b>1420 9/11/2008</b>	Permit Effective Date <b>3/1/2007</b>
	Exit Time/Date <b>1615 9/11/2008</b>	Permit Expiration Date <b>2/29/2012</b>
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) <b>Kirby Massey/Mayor/870-739-3233 Cell-870-225-3452</b>	Other Facility Data	
Name, Address of Responsible Official/Title/Phone and Fax Number <b>Kirby Massey/Mayor/870-739-3233 Cell-870-225-3452</b> <b>City of Sunset</b> <b>300 John H. Johnson Blvd.</b> <b>Sunset, AR 72364</b>	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	U	Operations & Maintenance	N	Sampling
N	Records/Reports	N	Self-Monitoring Program	N	Sludge Handling/Disposal	U	Pollution Prevention
N	Facility Site Review	N	Compliance Schedules	N	Pretreatment	N	Multimedia
N	Effluent/Receiving Waters	N	Laboratory	N	Storm Water	U	Other: SSO

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

This SSO inspection was conducted in response to a complaint alleging repeated overflows of the sewer system.

The City of Sunset operates and maintains two pump stations. The City of Sunset pumps their sewage to the City of Marion (AR0021971) for treatment.

Multiple violations were noted. See the attached letter and inspection report for a thorough listing and explanation of all findings.

Name(s) and Signature(s) of Inspector(s) <b>Brent L. Walker</b> <i>Brent L. Walker</i>	Agency/Office/Telephone/Fax <b>AR Dept. of Environmental Quality-Jonesboro</b> <b>(870) 935-7221 ext. 12/(870) 935-4715 (Fax)</b>	Date <b>October 17, 2008</b>
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date

<b>PUMP STATION VISIT (COMPLETE A SEPARATE CHECKLIST FOR EACH PUMP STATION VISITED)</b>	
<b>GENERAL INFORMATION AND OVERALL EVALUATION</b>	<input type="checkbox"/> S <input type="checkbox"/> M <input checked="" type="checkbox"/> U <input type="checkbox"/> NA
Name and/or Location of Pump Station: <b>Harvard Road Pump Station – Located behind #39 Harvard Rd.</b>	
TYPE(S) OF WASTE WATER RECEIVED: <input checked="" type="checkbox"/> RESIDENTIAL <input checked="" type="checkbox"/> COMMERCIAL <input checked="" type="checkbox"/> INDUSTRIAL <input type="checkbox"/> OTHER:	
NUMBER OF PUMPS: <u>2</u>	NUMBER OPERATIONAL: <u>1</u>
NUMBER AND SIZE OF PUMPS APPEARS ADEQUATE: <u>Pumps would likely be adequate if properly maintained.</u>	<input type="checkbox"/> S <input checked="" type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
EVIDENCE OF RECENT OVERFLOWS OR HIGH LEVELS:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
<b>GENERAL OPERATION AND MAINTENANCE</b>	
CLEAN AND WELL MAINTAINED WITH MINIMAL STORAGE OF UNRELATED EQUIPMENT:	<input type="checkbox"/> S <input type="checkbox"/> M <input checked="" type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
GATES/DOORS/HATCHES/LIDS/ETC. LOCKED TO PREVENT UNAUTHORIZED ACCESS AND/OR TAMPERING:	<input type="checkbox"/> S <input type="checkbox"/> M <input checked="" type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
WET WELLS, SUMPS AND PITS ADEQUATELY COVERED, GRATED OR OTHERWISE PROTECTED:	<input type="checkbox"/> S <input type="checkbox"/> M <input checked="" type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
ELECTRICAL CONTROLS COVERS CONDUIT AND EQUIPMENT PROPERLY INSTALLED AND MAINTAINED:	<input type="checkbox"/> S <input type="checkbox"/> M <input checked="" type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
GUARDS AND SHIELDS IN PLACE AROUND MOVING EQUIPMENT (BELTS, PULLEYS, DRIVESHAFTS, ETC.):	<input type="checkbox"/> S <input type="checkbox"/> M <input checked="" type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
ADEQUATE VENTILATION TO PREVENT EXCESSIVE CONDENSATION AND/OR GASES AND FUMES:	<input type="checkbox"/> S <input type="checkbox"/> M <input checked="" type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
ADEQUATE LIGHTING FOR ROUTINE INSPECTION/MAINTENANCE:	<input type="checkbox"/> S <input type="checkbox"/> M <input checked="" type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
SEALS, VALVES AND PACKING ADEQUATELY MAINTAINED TO PREVENT LEAKS:	<input type="checkbox"/> S <input type="checkbox"/> M <input checked="" type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
MINIMAL ACCUMULATION OF GREASE AND SOLIDS IN WET WELLS:	<input type="checkbox"/> S <input type="checkbox"/> M <input checked="" type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
<b>BACKUP POWER AND ALARMS</b>	
PROVISIONS FOR GENERATOR AND/OR EMERGENCY TRANSFER PUMP:	<input type="checkbox"/> S <input type="checkbox"/> M <input checked="" type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
AUDIBLE/VISUAL ALARM WITH EMERGENCY CONTACT INFORMATION POSTED:	<input type="checkbox"/> S <input type="checkbox"/> M <input checked="" type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
SCADA SYSTEM (LIST PARAMETERS MONITORED):	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE

<b>PUMP STATION VISIT (COMPLETE A SEPARATE CHECKLIST FOR EACH PUMP STATION VISITED)</b>	
<b>GENERAL INFORMATION AND OVERALL EVALUATION</b>	<input type="checkbox"/> S <input type="checkbox"/> M <input checked="" type="checkbox"/> U <input type="checkbox"/> NA
Name and/or Location of Pump Station: <b>Main Sunset Pump Station – Located behind City Hall on John H. Johnson Blvd.</b>	
TYPE(S) OF WASTE WATER RECEIVED: <input checked="" type="checkbox"/> RESIDENTIAL <input checked="" type="checkbox"/> COMMERCIAL <input checked="" type="checkbox"/> INDUSTRIAL <input type="checkbox"/> OTHER:	
NUMBER OF PUMPS: <u>2</u>	NUMBER OPERATIONAL: <u>1</u>
NUMBER AND SIZE OF PUMPS APPEARS ADEQUATE: <u>Pumps would likely be adequate if properly maintained.</u>	<input type="checkbox"/> S <input checked="" type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
EVIDENCE OF RECENT OVERFLOWS OR HIGH LEVELS:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
<b>GENERAL OPERATION AND MAINTENANCE</b>	
CLEAN AND WELL MAINTAINED WITH MINIMAL STORAGE OF UNRELATED EQUIPMENT:	<input type="checkbox"/> S <input type="checkbox"/> M <input checked="" type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
GATES/DOORS/HATCHES/LIDS/ETC. LOCKED TO PREVENT UNAUTHORIZED ACCESS AND/OR TAMPERING:	<input type="checkbox"/> S <input type="checkbox"/> M <input checked="" type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
WET WELLS, SUMPS AND PITS ADEQUATELY COVERED, GRATED OR OTHERWISE PROTECTED:	<input type="checkbox"/> S <input type="checkbox"/> M <input checked="" type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
ELECTRICAL CONTROLS COVERS CONDUIT AND EQUIPMENT PROPERLY INSTALLED AND MAINTAINED:	<input type="checkbox"/> S <input checked="" type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
GUARDS AND SHIELDS IN PLACE AROUND MOVING EQUIPMENT (BELTS, PULLEYS, DRIVESHAFTS, ETC.):	<input type="checkbox"/> S <input type="checkbox"/> M <input checked="" type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
ADEQUATE VENTILATION TO PREVENT EXCESSIVE CONDENSATION AND/OR GASES AND FUMES:	<input type="checkbox"/> S <input type="checkbox"/> M <input checked="" type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
ADEQUATE LIGHTING FOR ROUTINE INSPECTION/MAINTENANCE:	<input type="checkbox"/> S <input type="checkbox"/> M <input checked="" type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
SEALS, VALVES AND PACKING ADEQUATELY MAINTAINED TO PREVENT LEAKS:	<input type="checkbox"/> S <input type="checkbox"/> M <input checked="" type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
MINIMAL ACCUMULATION OF GREASE AND SOLIDS IN WET WELLS:	<input type="checkbox"/> S <input type="checkbox"/> M <input checked="" type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
<b>BACKUP POWER AND ALARMS</b>	
PROVISIONS FOR GENERATOR AND/OR EMERGENCY TRANSFER PUMP:	<input type="checkbox"/> S <input type="checkbox"/> M <input checked="" type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
AUDIBLE/VISUAL ALARM WITH EMERGENCY CONTACT INFORMATION POSTED:	<input type="checkbox"/> S <input type="checkbox"/> M <input checked="" type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
SCADA SYSTEM (LIST PARAMETERS MONITORED):	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE

**Water Division NPDES Photographic Evidence Sheet**

<b>Location:</b>	City of Sunset		
------------------	----------------	--	--

<b>Photographer:</b>	Brent Walker	<b>Witness:</b>	None
----------------------	--------------	-----------------	------

<b>Photo #</b>	1	<b>Of</b>	6	<b>Date:</b>	9/11/2008	<b>Time:</b>	1449
----------------	---	-----------	---	--------------	-----------	--------------	------

<b>Description:</b>	Evidence of recent overflow from nearby manhole behind Harvard One Apartments.
---------------------	--



9/11/2008 / 14:49:52

<b>Photographer:</b>	Brent Walker	<b>Witness:</b>	None
----------------------	--------------	-----------------	------

<b>Photo #</b>	2	<b>Of</b>	6	<b>Date:</b>	9/11/2008	<b>Time:</b>	1500
----------------	---	-----------	---	--------------	-----------	--------------	------

<b>Description:</b>	Accumulation of excessive solids in Harvard St. pump station with uncovered wet well and multiple leaks.
---------------------	--



9/11/2008 / 15:00:20

**Water Division NPDES Photographic Evidence Sheet**

<b>Location:</b>	City of Sunset		
------------------	----------------	--	--

<b>Photographer:</b>	Brent Walker	<b>Witness:</b>	None
----------------------	--------------	-----------------	------

<b>Photo #</b>	3	<b>Of</b>	6	<b>Date:</b>	9/11/2008	<b>Time:</b>	1501
----------------	---	-----------	---	--------------	-----------	--------------	------

<b>Description:</b>	Stick and bungee cord being used to energize motor starter for Harvard St. pump station.
---------------------	--



<b>Photographer:</b>	Brent Walker	<b>Witness:</b>	None
----------------------	--------------	-----------------	------

<b>Photo #</b>	4	<b>Of</b>	6	<b>Date:</b>	9/11/2008	<b>Time:</b>	1608
----------------	---	-----------	---	--------------	-----------	--------------	------

<b>Description:</b>	Uncovered wet well with accumulation of excessive solids in the main pump station.
---------------------	--





**Water Division NPDES Photographic Evidence Sheet**

<b>Location:</b>	City of Sunset						
<b>Photographer:</b>	Brent Walker			<b>Witness:</b>	None		
<b>Photo #</b>	5	<b>Of</b>	6	<b>Date:</b>	9/11/2008	<b>Time:</b>	1608
<b>Description:</b>	Slipping belt at main pump station.						



<b>Photographer:</b>	Brent Walker			<b>Witness:</b>	None		
<b>Photo #</b>	6	<b>Of</b>	6	<b>Date:</b>	9/11/2008	<b>Time:</b>	1447
<b>Description:</b>	High water level in manhole behind Harvard One Apartments. Note accumulated solids.						

