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October 3, 2023

Mr. Richard Healey
Enforcement Branch
5301 Northshore Drive
North Little Rock AR 72118

RE: Inspection Follow UP AFIN: 04-00052, NPDES Permit No.: AR0022292

Dear Mr. Healey,

I will do my best to address what we have accomplished since Mr. Cody's inspection on July 27, 2023, and the Zoom meeting you had with myself, Mayor Tharp, and our Design Build team, which is working on the current and long-term solutions.

The problems we have with overflows or potential overflows are listed below in a few narrow problems. Our challenge is how to manage these areas better before our upgrade, and make sure we deal with them during the upgrade to prevent them from happening again. Mr. Healey I can assure you we are trying to solve problems now, and are making strides, but I believe solving these main issues will prevent almost all of the other problems we have not had yet by catching them sooner. Most of the time I feel like we put out some of the best effluent to the creek of anybody, especially with our loading. Here is some of our biggest issues and what we are working on to fix them...

1. **Electrical Surges:** We all too often have storms like everyone else that seem bigger and more intense. Lightning has not direct hit us in years, however we get surges that turn off equipment, or cause some of the more sensitive equipment to fault, needing to be reset. Usually, these surges or blips are quick, the backup generator not even being called for. When this happens, some equipment may not restart on its own.
 - A. **Possible Solutions:** I have reached out to a company called SineTamer to supply us with simple surge suppressors for each of our HMI or control panels around the plant, to absorb these power fluctuations when they occur. For \$2,800 we are going to make this happen soon. This is one of the big areas that cause us problems especially during storms. Alarm improvement will also help us.
2. **Alarm Improvements:** This problem is two part. During storms we have had the internet shut down due to lightning or other. When this happens, problems do not get sent out. If the internet gets knocked out, it is likely as stated above, other equipment gets shup off and does not restart. The other problem has been more recent. Equipment may send out an alarm, but for whatever

reason it does not make it through the computers and network, to the off-duty person who could respond.

- A. **Possible Solutions:** If it is after hours, and internet is lost. I got out of bed recently when this happened and went to the plant until other employees arrived. Or the internet was restored so that remote access was available. We have a good internet service that is underground, interruption of service has been rare. One other idea getting strong consideration is to add a different service all together, that could let us know of high basin levels that may occur from storms or equipment failure. And adding other critical alarm items into the alert system during the expansion will go a long way to prevent future issues.
3. **Screening Issues:** This is one of our biggest issues, that is driving our upcoming expansion more that flow increases. Our secondary screens looked like good equipment on paper, but not in reality. We have improved our primary screen to protect our pump station and secondary screens. But wipes and ragging has plagued us since the COVID year. This for the most part, is not in SCADA, and this is a problem, especially on problem notification. We have added a "De-ragger" system to our influent pump station recently, and this has been a tremendous help. When a pump starts to clog from rags, it stops, reverses and usually releases the rag.
4. **Influent Pump Station:** This has been a past problem, due to getting repairs and parts. Our pump station is not SCADA connected. This station size, both volume and pumping capacity is an issue when large rain events happen.
 - A. **Solutions:** A huge focus of our upcoming upgrades is getting water into the plant. This is my single biggest concern during storms and flooding. We will have a new influent pump station and screening upon completion of our upgrade, with SCADA connection. In the mean time we do have a camera that observes the station, but preventing problems here will be a challenged until upgraded.

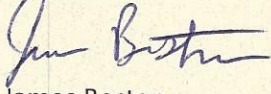
These are some of the main reasons water can overflow and get away from treatment. We recently spent a lot of money for grounds clean up. And will do more when necessary.

I would like to add that we now have from 4 am until 7 pm coverage Monday-Friday at the wastewater facility. Weekends when our large industry is not working, we have not had any issues. We do on-calls to the facility daily on weekends and holidays. We are looking however at ways to get more hours on-site if we do not feel like we are able to address the above issues. One way we have done this is to add cameras at the facility, we now have 16 of them, that gives me another way to monitor the plant. I am currently looking at motions sensing camera's that would alarm me if water reached an area of a basin that is not normally covered by water. This would help us prevent basin overflows with a second alert.

We are striving to never have any overflow issues; our upcoming upgrade will go a long way with what we have learned since the last expansion. This will also free up our equalization basin so the we can only use it during large rain events or plant problems. We should be submitting drawings for your departments review by the end of October 2023.

If I have left anything out of this response, please let me know and I will get a response to you promptly. Please let me know if you have any question or concerns.

Respectfully,

A handwritten signature in dark ink, appearing to read "James Boston". The signature is fluid and cursive, with a prominent initial "J" and a long, sweeping underline.

James Boston
Public Works Manager
City of Decatur