



ARKANSAS

ENERGY & ENVIRONMENT

July 20, 2021

Email: MLedbetter@cityhs.net

Monty Ledbetter
Utilities Director
City of Hot Springs
P.O. Box 700
Hot Springs, AR 71902

**RE: NPDES Permit Number: AR0033880, AFIN: 26-00145
Request for Bacteria Sampling and a Communications Plan**

Dear Mr. Ledbetter,

The City of Hot Springs has reported a large number of Sanitary Sewer Overflows (SSOs) at the Gulpha pump station and Manhole 1750 off Catherine Heights Road in Hot Springs, Arkansas. When these SSOs occur, the Gulpha pump station and Manhole 1750 discharge directly into Gulpha Creek, which then flows into Spencer Bay of Lake Catherine. Gulpha Creek and Spencer Bay are both utilized by the public for recreational purposes.

DEQ has been notified of a dry-weather SSO occurring from manhole number 1750 that began on Saturday, July 17, 2021, and ended on Monday, July 19, 2021. This multi-day dry-weather SSO, combined with documented frequent wet-weather SSOs, may present a threat to public health. As such, DEQ has referred this matter to the Arkansas Department of Health for review.

As a result of these continuing overflows, DEQ requests the following:

- The City of Hot Springs, upon discovery of any SSO at Manhole 1750 or any other manhole or pump station that discharges into Gulpha Creek, shall immediately sample the unpermitted discharge before confluence with the receiving stream for Fecal Coliform Bacteria and *E. coli*. Copies of the analytical results, GPS coordinates and description of the sample location(s), and chain of custody forms shall be emailed to the DEQ's Office of Water Quality, Enforcement Branch within three (3) calendar days of the event sampled.
- The City of Hot Springs, **by the close of business on Friday, July 23, 2021**, shall submit a Communication Plan that will (1) immediately notify the public of the water quality issues in the Gulpha Creek and Spencer Bay of Lake Catherine* and (2) provide a schedule for keeping the public informed about improvements or degradation of water quality in Gulpha Creek / Spencer Bay.

*For this effort, the City of Hot Springs will engage with the Arkansas Department of Health to obtain guidance on what information to include that will address public health concerns, and what delivery methods to utilize to inform the public.

- The City of Hot Springs, **by close of business on Friday July 23, 2021**, shall submit an Interim Plan that describes the operational and best management practices that the City of Hot Springs will immediately implement to mitigate the impact of the continued SSOs. Some suggested interim measures could potentially include plans to contain, collect, transport, and treat the effluent from this ongoing unpermitted discharge, and should include provisions for inspections and methods for cleanup and disinfection as needed.

Should you have any questions concerning this matter, please do not hesitate to contact me at alan.york@adeq.state.ar.us.

With kind regards,

Alan J. York
Associate Director
Office of Water Quality, DEQ
5301 Northshore Drive, North Little Rock, AR 72118

Cc: Todd Piller TPiller@cityhs.net
Gary Carnahan GCarnahan@cityhs.net
Harold Mauldin HMauldin@cityhs.net
[Bill Burrough, BBurrough@cityhs.net](mailto:BBurrough@cityhs.net)
Craig Johnson cjohnson@crisengineers.com
Terry Paul, Environmental Health Branch Chief, ADH, terry.paul@arkansas.gov
Stacie Wassell, Deputy Associate Director OWQ Wassell@adeq.state.ar.us
Richard Healey, OWQ Enforcement Branch Manager, healey@adeq.state.ar.us