



# ARKANSAS

## ENERGY & ENVIRONMENT

June 23, 2022

Email: [MLedbetter@cityhs.net](mailto: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 for  
Sanitary Sewer Overflows into Hot Springs Creek**

Dear Mr. Ledbetter,

The City of Hot Springs has reported a large number of Sanitary Sewer Overflows (SSOs) at the Hot Springs Creek pump station, Manhole 12242 off Forest View Court, and Manhole 1865 off 352 Fontana Road in Hot Springs, Arkansas. SSOs at the Hot Springs Creek pump station and Manholes 12242 and 1865 discharge directly into Hot Springs Creek and then into Lake Hamilton. The confluence of Hot Springs Creek and Lake Hamilton and the adjacent downstream bays including, but not limited to, the bay north of Rex Houston Circle are frequently used for recreational purposes.

The most recent SSO reported to DEQ was a significant wet-weather SSO from Manhole 12242 and Manhole 1865 that began on Friday, June 10, 2022 at 8:30am and continued until Friday, June 10, 2022 at 7:30pm. During this SSO event, approximately 312,000 gallons of untreated sewage was released into waters of the state. As result of these recurring overflows, DEQ requires the following:

- (1) The City of Hot Springs, upon discovery of a sanitary sewer overflow (SSO) at Manhole 12242 or any other manhole or pump station that discharges into the Hot Springs Creek, shall immediately sample the unpermitted discharge for *E. coli*.<sup>1</sup> Copies of the analytical results and chain-of-custody forms shall be emailed to the DEQ Office of Water Quality, Enforcement Branch within three calendar days of sample collection.
- (2) For each SSO event, City of Hot Springs shall monitor and sample Hot Springs Creek at a point near the confluence with Lake Hamilton for *E. coli*. Copies of the analytical results and chain-of-custody forms shall be emailed to DEQ Office of Water Quality, Enforcement Branch within three calendar days of sample collection.

For each sample exceeding 126 cfu/100mL for *E. coli*, City of Hot Springs shall sample three distinct locations within the bay area, directly downstream of the confluence, for *E. coli*. Copies of the analytical results and chain-of-custody forms shall be emailed to the DEQ Office of Water Quality, Enforcement Branch within three calendar days of sample

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<sup>1</sup> Analyses must be performed in accordance with 40 C.F.R. 136.

collection. When such additional sampling occurs, the City of Hot Springs shall also notate the coordinates of the sample locations on the chain of custody forms.

- (3) The City of Hot Springs shall, **by close of business on Friday, July 8, 2022**, submit a Communication Plan that will
- (a) Immediately notify the public of the water quality issues in Hot Springs Creek. Specifically, the notification shall be communicated to residents in the area of the confluence of Hot Springs Creek and Lake Hamilton and the adjacent downstream bays including, but not limited to, the bay north of Rex Houston Circle. The City of Hot Springs can use its CodeRED notification system and post signage to the impacted areas. As needed, the City of Hot Springs may engage with the Arkansas Department of Health to obtain guidance on what information to include that will address public health concerns.
  - (b) Provide a schedule for keeping the public informed about improvements or decreases in water quality.

Should you have any questions concerning this matter, please do not hesitate to contact me at 501-683-0673 or at [alan.york@adeq.state.ar.us](mailto:alan.york@adeq.state.ar.us).

Sincerely,

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

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