



ARKANSAS

ENERGY & ENVIRONMENT

August 03, 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,

Thank you for the submission in response to DEQ's Request for Bacteria Sampling and Communications Plan. I do appreciate the effort put forth by the City of Hot Springs to provide a thorough and timely response to my letter of July 20, 2021.

DEQ Office of Water Quality (OWQ) staff has reviewed the submission and make the following specific suggestions:

1. **Standard Operating Procedure – Response – 9** – OWQ believes a methodology to estimate the volume of future Sanitary Sewer Overflows (SSOs) accurately should be adopted. If such a methodology has been adopted, please provide the methodology to OWQ. An additional suggestion is to install a visual gauge at manhole 1750 in order to measure the height of the escaping fluid as an SSO occurs. While not definitive, it will provide City of Hot Springs the ability to document and calculate flow rates based upon the wastewater escaping the system.
2. **Standard Operating Procedure – Field Reporting** – OWQ believes that upstream inspection of manholes for additional SSOs is warranted when manhole 1750 is overflowing. The proximity of Manhole 1749 would lead to a logical conclusion that it also overflows with similar frequency as manhole 1750.
3. **Standard Operating Procedure – Public Notification**– OWQ believes that, in addition to the signage depicted on Exhibit A, signage at approximately the location of Sampling Location 2 is also warranted, and if possible, on both sides of Gulpha Creek. City of Hot Springs communicated through verbal communication that signage at the mouth of Spencer Bay may also be deployed. Please provide the criteria that will determine whether and when signage is deployed at the mouth of Spencer Bay.
4. **Standard Operating Procedure – Sampling and Testing** – OWQ believes that if sampling at the locations depicted on Exhibit A indicate presence of *E. coli* exceeding the 126 cfu/100ml, additional upstream or downstream sampling may be warranted, particularly in seasons when Lake Catherine and Spencer Bay have been drawn down

allowing the pollution to travel further into the lake without dilution. .

Should you have any questions concerning this matter, or if the above listed suggestions should require further discussion, please do not hesitate to contact me at alan.york@adeq.state.ar.us.

With kind regards,

Alan J. York
Associate Director
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