



**City of Hot Springs  
Engineering Department**

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April Layher  
Enforcement Analyst  
Water Division, ADEQ  
5301 Northshore Drive  
North Little Rock, AR 72118-5317

Certified

Re: Permit number AR0033880

Dear Ms. Layher:

**Regional Wastewater Plant Permit Non-Compliance**

**Permit number: AR0033880**

The following will serve to document the root cause of the NPDES permit violation, as it relates to Ammonia levels, for our Regional Wastewater Plant located on Davidson Dr. in Hot Springs, Ar. This document will also provide an account of the measures taken by CHS staff to resolve the plant upset condition. All measures are intended to mitigate the potential for additional issues and to reduce the Ammonia levels.

- The reason for the Ammonia limits exceeding permit level is fairly easy to identify. We lost our Boiler that provided heat to the Digesters, once the Boiler became inoperable we pursued a repair effort. In the middle of that endeavor we discovered the Boiler was beyond repair. That lead us to the effort involving procurement and installation of a new Boiler. During the start up of the new Boiler we discovered our gas line had degraded to the extent it too had to be replaced. All of this took so much time we ended up having temperatures too low to support the biological needs for our "Bugs". Once the new Boiler was installed we began trying to bring the Digesters back to the operating temperatures. We found that trying to heat both of them was impractical, at that point we began to make operational adjustments to heat only (1) at a time. We have since made good progress on that effort. In addition to those operational changes we also have introduced an operational change to utilize (3) of our Blowers as opposed to our normal practice of running (2) of them. At this time, we are achieving a level of success. The non-compliance report you will receive is for the month of June. If our trends continue as they are today, we will exceed the first 7 days of July but should be compliant with the 30 day levels.

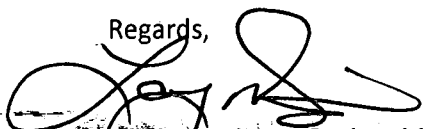
We anticipate a full recovery of our Digesters by end of July that will once again demonstrate we are compliant with the permit levels.

- Below are the daily Ammonia levels for the month of July:

- 7/1 - 10.5
- 7/2- 8.75
- 7/3- 5.36
- 7/4- 6.79
- 7/5- 4.3
- 7/6- 12.8
- 7/7- 16.6
- 7/8- 14.7
- 7/9- 9.92
- 7/10- 6.81
- 7/11- 2.31
- 7/12- 2.19
- 7/13- 0.11
- 7/14- 0.75
- 7/15- 0.23
- 7/16- 0.25
- 7/17- 0.21
- 7/18- 0.42
- 7/19- 0.84
- 7/20- 1.1
- 7/21- 0.05

The City of Hot Springs has a history of permit compliance of which we are very proud. We also value our relationship with our partners at ADEQ. Our meeting on July 8<sup>th</sup> was a demonstration of our good faith effort to maintain an open communication with ADEQ. We are grateful for your help to date and will always invite your team to offer any recommendation(s) that will enable us to succeed.

Regards,



Larry Merriman, Project Manager  
City of Hot Springs

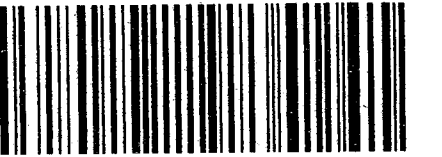
CC: Bill Burrough  
Gary Carnahan  
James Sorrells



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