

September 24, 2008

Steve Mallett, Public Works Director City of Hot Springs P.O. Box 700 Hot Springs, Arkansas 71901

RE: Multiple Sanitary Sewer Overflows

AFIN: 26-00145 NPDES Permit No.: AR0033880

Dear Mr. Mallett:

During the month of September 2008, I performed multiple SSO inspections of the city's waste water collection system in accordance with the provisions of the Federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, and the regulations promulgated thereunder. This inspection revealed the following violations.

- Inadequate number backup power sources for the number of pump stations maintained by the city. This resulted in an excessive number of overflows that occurred during the power outages caused by remnants of Hurricane Gustav and Ike. The pump stations that were noted as failing were: Lakeside, Fairwood, Molly Creek, Hot Spring Creek, Hot Springs 1, 2, & 3, Mazarn 1, 2, & 3, Catherine Heights, Fontana, Beverly Hills, Winkler and Carpenter Dam Pump Stations
- 2. Most of the existing backup power sources <u>failed</u> or were not adequate during the power outages. The backup power sources that were noted as failing were. Fairwood, Hot Springs 2, Hot Springs 3, Hot Springs 4, and Beverly Hills.
- 3. Excessive Inflow and Infiltration causing multiple pumps stations to overflow during these rainfall events. Gulpha Creek, Hot Springs Creek, and Hot Springs 1, all failed.

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The above items require your immediate attention. Please submit a written response to these findings to the Water Division Enforcement Section of this Department at the following address:

Water Division Enforcement Section Arkansas Department of Environmental Quality 5301 Northshore Drive North Little Rock, AR 72118-5317

This response should contain detailed documentation describing the course of action taken to correct the items noted. This corrective action should be completed as soon as possible, and the written response is due by October 10, 2008.

For additional information you may contact the enforcement section by telephone at 501-682-0639 or by fax at 501-682-0910.

If I can be of any assistance, please contact me at 501-520-0541

Sincerely,

Jim McSwain District 7 Field Inspector Water Division

cc: Water Division Enforcement Branch Water Division Permits Branch

≎EPA							Form Approved OMB No. 2040-0003	
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY								
Washington, D.C. 20460 NPDES Compliance Inspection Report								
Section A: National Data System Coding								
1 N 2 5 3 A R 0 0 3 3 8 8 0 11 12 0 8 0 9 0 8 17 18 1						RInspectorFac. TypeR19S201		
	F	Remarks	S					
Inspection Work Days Facility Evaluatio	n Rating	BI	Q	A	I	F	Reserved	
67 <u>69</u> 70 <u>3</u>	71	Ν	72	N 73	74 75		80	
Section B: Facility Data								
Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number)				Entry Time/Date 0835 9/8/08			Permit Effective Date January 1, 2008	
City of Hot Springs 117 Caroline Acres Road Hot Springs, AR				Exit Time/Date 0855 9/8/08			Permit Expiration Date December 31, 2013	
						er Facility Data		
Name, Address of Responsible Official/Title/Phone and Fax Number Kent Myers, City Manager, 501-321-6810 320 Davidson Drive Hot Springs, Arkansas 71901				Contacted Yes No 🗹				
<b>Section C: Areas Evaluated During Inspection</b> (S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)								
- Permit - Flow Measure	Flow Measurement		<b>Operations &amp; Maintenance</b>			-	Sampling	
- Records/Reports - Self-Monitorin	g Program	Program - Slu		dge Handling/Disposal		-	Pollution Prevention	
- Facility Site Review - Compliance Set	hedules	dules - Pre		etreatment		-	Multimedia	
- Effluent/Receiving Waters - Laboratory		- Storm Water				U	Other: (SSO)	
Section D: Summary of Findings/Comments (Attach additional sheets if necessary) In talking with Craig Stevens (City of Hot Springs), he stated that due to the hurricane/tropical storm Gustav, that roughly 40% of the service area was without power. He stated that they are trying to get Entergy to restore power ASAP but that Entergy stated that they are short handed and that some areas may be several days before restoring power. Craig stated that he has backup on the larger pump stations, but not on a lot of the smaller ones. He stated that he would report all of the overflows as required and remediate any areas needed.								
		gency/Office/Telephone/Fax AR Dept. of Environmental Quality – Hot Springs Field Office – 501-520-0541 – Fax 501-520-5978					Date 9/8/08	
Signature of Reviewer Agency/Office/Phon			and F	nd Fax Numbers			Date	