



A R K A N S A S
Department of Environmental Quality

February 13, 2017

Abbott C. Widdicombe, President
William L. Johnson Co., Inc.
P.O. 1055
West Memphis, AR 72303

RE: Lakeshore Estates MHP Inspection
AFIN: 18-00883 Permit No.: AR0021971 – Satellite System of Marion WWTP

Dear Mr. Widdicombe:

On November 30, 2016, I performed a Sanitary Sewer Inspection of the above referenced facility in accordance with the provisions of the Federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, and the regulations promulgated thereunder. A copy of the inspection report is enclosed for your records.

Please refer to the “Summary of Findings” section of the attached inspection report and provide a written response for each violation that was noted. This response should be mailed to the attention of the Water Division Inspection Branch at the address at the bottom of this letter or e-mailed to Water-Inspection-Report@adeq.state.ar.us. This response should contain documentation describing the course of action taken to correct each item noted. This corrective action should be completed as soon as possible, and the written response with all necessary documentation (i.e. photos) is due by **February 27, 2017**.

If I can be of any assistance, please contact me at walker@adeq.state.ar.us or 870-935-7221 ext.-12.

Sincerely,

Brent L. Walker
District 3 Field Inspector
Water Division



WATER DIVISION INSPECTION REPORT		
AFIN: 18-00883	PERMIT #: AR0021971-Sat.	DATE: 11/30/2016
COUNTY: 18 Crittenden	PDS #: 095337	MEDIA: WN
GPS LAT: 35.175754 LONG: -90.201780 LOCATION: General Area		

FACILITY INFORMATION	INSPECTION INFORMATION																
NAME: Lakeshore Estates MHP LOCATION: I-55 Service Rd. CITY: Marion	FACILITY TYPE: 2 - Industrial INSPECTOR ID#: 52138 S - State FACILITY EVALUATION RATING: N INSPECTION TYPE: Sanitary Sewer Overflow																
	<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width: 25%;">DATE(S):</td> <td style="width: 25%;">ENTRY TIME:</td> <td style="width: 25%;">EXIT TIME:</td> <td style="width: 25%;">PERMIT EFFECTIVE DATE:</td> </tr> <tr> <td>11/30/2016</td> <td>15:15</td> <td>16:10</td> <td>12/1/2013</td> </tr> <tr> <td>9/8/2016</td> <td>15:10</td> <td>15:25</td> <td>PERMIT EXPIRATION DATE:</td> </tr> <tr> <td>8/30/2016</td> <td>09:10</td> <td>09:45</td> <td>6/30/2017</td> </tr> </table>	DATE(S):	ENTRY TIME:	EXIT TIME:	PERMIT EFFECTIVE DATE:	11/30/2016	15:15	16:10	12/1/2013	9/8/2016	15:10	15:25	PERMIT EXPIRATION DATE:	8/30/2016	09:10	09:45	6/30/2017
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8/30/2016	09:10	09:45	6/30/2017														

RESPONSIBLE OFFICIAL	INSPECTION PARTICIPANTS
NAME / TITLE: Abbott C. Widdicombe / President COMPANY: William L. Johnson Co., Inc. MAILING ADDRESS: P.O. 1055 CITY, STATE, ZIP: West Memphis AR 72303 PHONE & EXT. / FAX: EMAIL:	NAME/TITLE/PHONE/FAX/EMAIL/ETC.: None Joel Burgos/Operator/via telephone
CONTACTED DURING INSPECTION: No	

AREA EVALUATIONS					
(S=Satisfactory, M=Marginal, U=Unsatisfactory, N=Not Applicable/Evaluated)					
U	PERMIT	N	FLOW MEASUREMENT	N	STORMWATER
N	RECORDS/REPORTS	N	LABORATORY	N	FACILITY SITE REVIEW
U	OPERATION & MAINTENANCE	N	EFFLUENT/RECEIVING WATER	N	SELF-MONITORING PROGRAM
N	SAMPLING	N	SLUDGE HANDLING/DISPOSAL	N	PRETREATMENT
N	OTHER:				

SUMMARY OF FINDINGS

Please provide a written report summarizing the corrective actions for the incident described below:

On 8/30/2016 samples were collected of a discharge from a sanitary sewer overflow between Birch Lake Cove and South Cove. This discharge was flowing into the lake located in the center of the mobile home park. Samples results were:

E. coli: 10,000 cfu/100 ml
Fecal Coliform Bacteria: 40,000 cfu/100 ml

The above sample results confirm the discharge of untreated sewage into the lake, which is a violation of the Arkansas Water and Air Pollution Control Act, A.C.A. § 8-4-217.(a)(1) Cause pollution, as defined in § 8-4-102, of any of the waters of this state. Additionally, this is an unpermitted discharge in violation of the Arkansas Water and Air Pollution Control Act - A.C.A. § 8-4-217.(b)(1). (Photos 1-8)

The operator (Joel Burgos, JS Burgos Co.) was contacted via telephone and advised of the overflow. Mr. Burgos stated that he was unaware of a current overflow, but utility work in the area had resulted in damage to the collection system that had caused past problems at that location. In a follow-up phone conversation, Mr. Burgos advised that he was using a temporary portable pump to bypass the damaged line thus eliminating the overflow. He further stated that chlorine tablets were placed in standing water around the overflow area for disinfection of any wastewater that did not flow back into the collection system.

A follow-up visit on 9/8/2016 confirmed the above temporary corrective action (Photos 9-14).

Mr. Burgos later advised that permanent repairs would be made by excavating and replacing a section of pipe that had been damaged by an underground utility bore.

A follow-up visit on 11/30/2016 indicated that the collection system was flowing properly and a temporary pump was no longer being used. Evidence of recent excavation to repair the damaged line was also present. The discharge hose was still in the downstream manhole and should be removed and the manhole cover replaced (Photos 15-18).

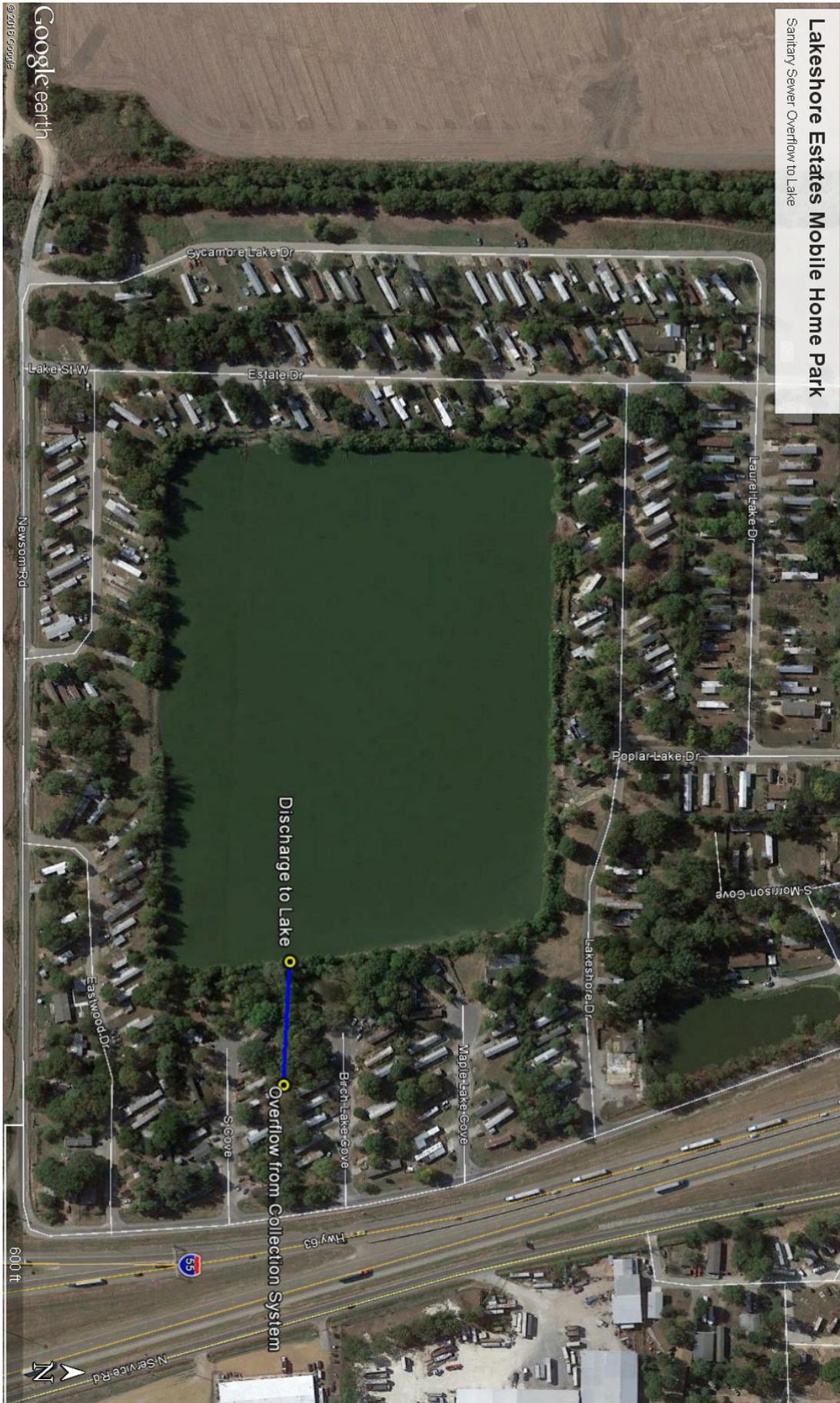
See attached map and photos.

GENERAL COMMENTS

Facility is a mobile home park that maintains its own sanitary sewer collection system that pumps to the City of Marion WWTP for treatment.

Facility has a history of I&I (inflow and infiltration) problems and repeated sewer overflows.

INSPECTOR'S SIGNATURE:  Brent L. Walker	DATE: 1/26/2017
SUPERVISOR'S SIGNATURE:  Jason Bolenbaugh	DATE: 2/9/2017



Water Division Photographic Evidence Sheet

Location:	Lakeshore Estates MHP		
Photographer:	Brent Walker	Date:	8/30/2016
Witness:	None	Time:	0916
		Photo #:	1
Description:	Seepage around manhole with solids indicative of recent overflow(s).		



Photographer:	Brent Walker	Date:	8/30/2016
Witness:	None	Time:	0918
		Photo #:	2
Description:	Manhole full to surface of ground with thick solids accumulation on top indicative of persistent backups.		



Water Division Photographic Evidence Sheet

Location:	Lakeshore Estates MHP				
Photographer:	Brent Walker	Date:	8/30/2016	Time:	0916
Witness:	None			Photo #:	3
Description:	Discharge from collection system immediately west of manhole in above photos.				



Photographer:	Brent Walker	Date:	8/30/2016	Time:	0917
Witness:	None			Photo #:	4
Description:	Closer view of discharge shown in photo 3.				



Water Division Photographic Evidence Sheet

Location:	Lakeshore Estates MHP		
Photographer:	Brent Walker	Date:	8/30/2016
Witness:	None	Time:	0932
		Photo #:	5
Description:	Discharge from photos 3 & 4 flowing west behind mobile homes toward lake.		



Photographer:	Brent Walker	Date:	8/30/2016
Witness:	None	Time:	0932
		Photo #:	6
Description:	Discharge from photos 3 & 4 flowing west toward lake.		



Water Division Photographic Evidence Sheet

Location:	Lakeshore Estates MHP				
Photographer:	Brent Walker	Date:	8/30/2016	Time:	0936
Witness:	None			Photo #:	7
Description:	Discharge from photos 3 & 4 flowing west into lake.				



Photographer:	Brent Walker	Date:	8/30/2016	Time:	0938
Witness:	None			Photo #:	8
Description:	Discharge from photos 3 & 4 flowing west into lake.				



Water Division Photographic Evidence Sheet

Location:	Lakeshore Estates MHP		
Photographer:	Brent Walker	Date:	9/8/2016
Witness:	None	Time:	1519
		Photo #:	9
Description:	Portable pump used to bypass blocked line. (Same manhole shown in photo 1)		



Photographer:	Brent Walker	Date:	9/8/2016
Witness:	None	Time:	1519
		Photo #:	10
Description:	Suction hose from portable pump in manhole. (Same manhole shown in photo 1)		



Water Division Photographic Evidence Sheet

Location:	Lakeshore Estates MHP		
Photographer:	Brent Walker	Date:	9/8/2016
Witness:	None	Time:	1515
		Photo #:	11
Description:	Discharge hose from portable pump running behind mobile homes to downstream manhole.		



Photographer:	Brent Walker	Date:	9/8/2016
Witness:	None	Time:	1514
		Photo #:	12
Description:	Discharge hose in downstream manhole.		



Water Division Photographic Evidence Sheet

Location:	Lakeshore Estates MHP		
Photographer:	Brent Walker	Date:	9/8/2016
Witness:	None	Time:	1515
		Photo #:	13
Description:	Area where discharge was previously flowing behind mobile homes and into lake.		



Photographer:	Brent Walker	Date:	9/8/2016
Witness:	None	Time:	1515
		Photo #:	14
Description:	Area where discharge was previously flowing into lake.		



Water Division Photographic Evidence Sheet

Location:	Lakeshore Estates MHP		
Photographer:	Brent Walker	Date:	11/30/2016
Witness:	None	Time:	1523
		Photo #:	15
Description:	Discharge hose no longer being used but still in downstream manhole.		



Photographer:	Brent Walker	Date:	11/30/2016
Witness:	None	Time:	1529
		Photo #:	16
Description:	Manhole where portable pump was used to pump around blockage.		



Water Division Photographic Evidence Sheet

Location:	Lakeshore Estates MHP		
Photographer:	Brent Walker	Date:	11/30/2016
Witness:	None	Time:	1528
		Photo #:	17
Description:	Manhole where portable pump was used to pump around blockage. Previously full of wastes as shown in photo 2.		



Photographer:	Brent Walker	Date:	11/30/2016
Witness:	None	Time:	1530
		Photo #:	18
Description:	Area where discharge had previously occurred. Note evidence of recent excavation for line repair/replacement.		



From: Abbott_Widdicombe
To: Water-Inspection-Report
Cc: Joelm9@aol.com; Walker, Brent
Subject: [BULK] Lakeshore Estates MHP Inspection AFIN: 18-00883
Date: Monday, February 27, 2017 3:05:51 PM

Dear Mr. Walker:

I am writing in response to your February 13, 2017 letter to inform you of and provide documentation of the completed corrective action in the above mentioned case. Below are copies of the emails from Joel Burgos describing and documenting with photographs the responses he took as the licensed operator of the Lakeshore Estates sewer and water system.

Please advise me if more information or action on my part is necessary.

Sincerely,
Abbott Widdicombe
cell 901 331-6136

From: Joel Burgos <Joelm9@aol.com>
Date: February 25, 2017 at 2:00:24 PM CST
To: abbottwiddicombe@gmail.com
Subject: Reference Brent Walker's letter from ADEQ

Brent called me about a sewage problem on South Cove northside. I tried unsuccessfully to unstop the sewage line several times. Unable to unstop the line, I used a portable water pump to pump the sewage from one manhole to the next manhole downstream. I also put liquid chlorine on the area where sewage had gotten on the ground. After that I called Brent and told him what I had done. I also told him that it would take some time to dig and repair the the mainline because there were many utilities in that small area and it had to be done by hand.

One resident that had complained of sewage backing up in their house was pleased when I found that their sewage line was blocked underneath their house and I called the plumber to come out and unstop their line and I paid for the repair.

When I dug the mainline up, I found a service line had been damaged and forced through the main sewer line. In order to repair the mainline I had to cut a section of the pipe out and replace it.

I have attached pictures of the repair in two more emails.

From: Joel Burgos <Joelm9@aol.com>
Date: February 24, 2017 at 5:01:38 PM CST
To: abbottwiddicombe@gmail.com





From: Joel Burgos <joelb9@aol.com>
Date: February 25, 2017 at 2:00:54 PM CST
To: abbottwidcombe@gmail.com







Sent from my iPhone

From: [Abbott Widdicombe](#)
To: [Water-Inspection-Report](#)
Cc: [Walker, Brent](#); [Joelmr9@aol.com](#)
Subject: Fwd:
Date: Monday, February 27, 2017 3:13:36 PM

Sorry. Here are the photos that did not make it with the prior email.

----- Forwarded message -----
From: **Joel Burgos** <joelmr9@aol.com>
Date: Sat, Feb 25, 2017 at 2:11 PM
Subject: Fwd:
To: abbottwiddicombe@gmail.com

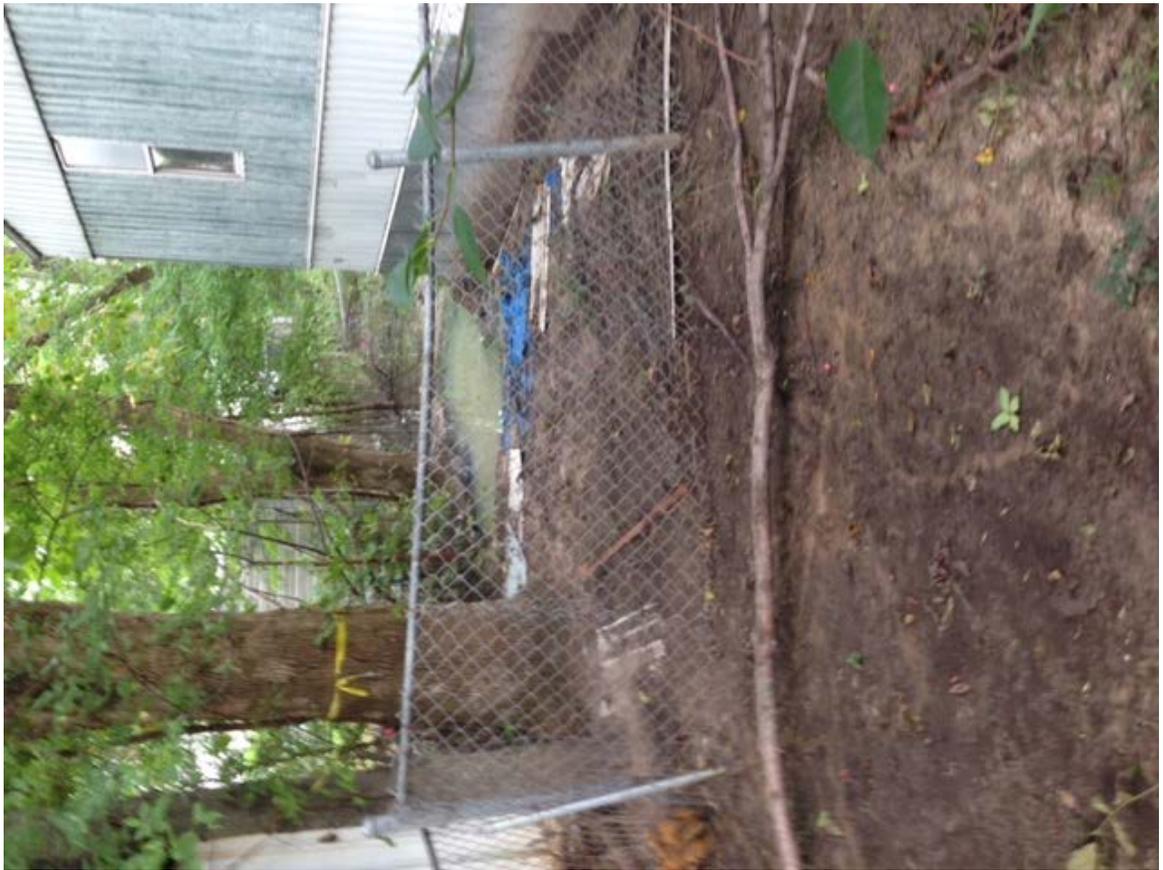
Sent from my iPhone

Begin forwarded message:

From: Joel Burgos <joelmr9@aol.com>
Date: February 24, 2017 at 5:01:38 PM CST
To: abbottwiddicombe@gmail.com







Sent from my iPhone

From: [Abbott Widdicombe](#)
To: [Water-Inspection-Report](#)
Cc: [Walker, Brent](#); [Joelmr9@aol.com](#)
Subject: [BULK] Fwd:
Date: Monday, February 27, 2017 3:14:49 PM

and the rest.

----- Forwarded message -----
From: **Joel Burgos** <joelmr9@aol.com>
Date: Sat, Feb 25, 2017 at 2:10 PM
Subject: Fwd:
To: abbottwiddicombe@gmail.com

Sent from my iPhone

Begin forwarded message:

From: Joel Burgos <joelmr9@aol.com>
Date: February 25, 2017 at 2:00:54 PM CST
To: abbottwiddicombe@gmail.com













Sent from my iPhone