ARKANSAS
ENERGY & ENVIRONMENT

April 18, 2022

Kevin A. Smith, Mayor
City of Helena-West Helena
P.O. Box 248
Helena, AR 72342
Sent Via Email To: mayor@helena-westhelena.us

RE: City of Helena Inspection
AFIN: 54-00083 Permit No.: AR0043389

Dear Mayor Smith:

On March 2, 2022, I performed a Collection System Evaluation/Sanitary Sewer Overflow 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 inspection report and provide a written response for each item noted. This case has been referred directly to the Office of Water Quality Enforcement Branch for further review. The City of Helena-West Helena should immediately initiate all actions necessary to resolve and correct the alleged violations cited in the inspection report. Written notification of the corrective actions taken for the alleged violations must be submitted within thirty (30) calendar days from receipt of this letter to the attention of Richard Healey, Office of Water Quality Enforcement Branch Manager, at (501) 682-0640 or healeyr@adeq.state.ar.us. This written notification should include; but not limited to, photographs and/or copies of other documentation.

If I can be of any assistance, please contact me at Bolenbaugh@adeq.state.ar.us or (501) 682-0659.

Sincerely,

Jason Bolenbaugh
Compliance Branch Manager, Office of Water Quality
5301 Northshore Drive, North Little Rock, AR, 72118

ENVIRONMENTAL QUALITY

OFFICE OF WATER QUALITY INSPECTION REPORT

AFIN: **54-00083**	PERMIT #: **AR0043389**	DATE: **3/2/2022**
COUNTY: **54 Phillips**	PDS #: **119870**	MEDIA: **WN**
GPS LAT: **34.518709** LONG: **-90.586323** LOCATION: **General Area**		

FACILITY INFORMATION

NAME:
City of Helena
LOCATION:
Multiple Locations
CITY:
Helena

RESPONSIBLE OFFICIAL

NAME: / TITLE
Kevin A. Smith / Mayor
COMPANY:
City of Helena-West Helena
MAILING ADDRESS:
P.O. Box 248
CITY, STATE, ZIP:
Helena AR 72342
PHONE & EXT: / FAX:
870-817-7439 /
EMAIL:
mayor@helena-westhelena.us
CONTACTED DURING INSPECTION: **No**

INSPECTION INFORMATION

FACILITY TYPE:	INSPECTOR ID#:
1 - Municipal	**83321 S - State**
FACILITY EVALUATION RATING:	INSPECTION TYPE:
1 - Unsatisfactory	**SSO/Collection System**

DATE(S):	ENTRY TIME:	EXIT TIME:	PERMIT EFFECTIVE DATE:
3/2/2022	**09:15**	**13:30**	**3/1/2021**
			PERMIT EXPIRATION DATE: **2/28/2026**

FAYETTEVILLE SHALE RELATED: **N**
FAYETTEVILLE SHALE VIOLATIONS: **N**

INSPECTION PARTICIPANTS

NAME/TITLE/PHONE/FAX/EMAIL/ETC.:
Jeff Patterson, General Manager, (870) 816-5251
Joey Williams, Maintenance, (870) 228-2874

AREA EVALUATIONS

(S=Satisfactory, M=Marginal, U=Unsatisfactory, N=Not Applicable/Evaluated)

**	PERMIT	**	FLOW MEASUREMENT	**	STORMWATER
**	RECORDS/REPORTS	**	LABORATORY	**	FACILITY SITE REVIEW
U	OPERATION & MAINTENANCE	**	EFFLUENT/RECEIVING WATER	**	SELF-MONITORING PROGRAM
**	SAMPLING	**	SLUDGE HANDLING/DISPOSAL	**	PRETREATMENT
**	OTHER:				

SUMMARY OF FINDINGS

- **On March 7, 2022, a request to Mayor Keven A. Smith and Mr. Jeff Patterson for additional information detailing specifics of the collection system was made but no response was provided. An additional request to Mayor Smith and Mr. Patterson was made on March 16, 2022. Again, no response was received. Failure to provide information is a violation of Part III, Section D.9 of the permit.**

- **According to Mr. Patterson, Pump Stations 3, 4, 5, and 6 all have bypass pumps installed at them because none of the two pumps located at each pump station are operational. The bypass pumps have been in place and used as the primary pumping mechanism for these pump stations for 1-2 years. The permittees failure to properly operate and maintain the pump stations is in violation of Part III, Section B.1.A of the permit.**

- **Pump Station 1 only had a single seventy-five horsepower pump that was operational at the time of the inspection. The control box for Pump 1 had failed, was removed from the wall, and was on the pump station floor at the time of the inspection. Failure to replace the control box is in violation of Part III, Section B.1.A of the permit.**

- **Pump stations lack emergency contact information in the event a member of the public identifies an overflow or pump station failure.**

- **An evaluation of all pump stations should be conducted using the latest edition of "10 State Standards - Recommended Standards for Wastewater Facilities as a minimum standard for design and operation". Please provide a list of deficiencies for each pump station and a timeline for correcting each deficiency.**

GENERAL COMMENTS		
• **The bypass pumps require operations staff to fill with diesel fuel twice per day so the pumps will continue to run over a 24-hour period. On average it requires 180 gallons of diesel fuel per day to operate a single 8-inch bypass pump. The permittee currently operates 4 bypass pumps in the City of Helena and one bypass pump in the City of West Helena. Those bypass pumps range in size from 4-inch to 10-inch.** • **From January, 2019 to November, 2020 the permittee reported 63 SSOs. No SSOs have been reported since.** • **The permittee should maintain inspection and maintenance records whenever inspections or maintenance occurs at the pump stations.** • **This inspection was conducted following a complain investigation of a broken 12-inch sewer main located at Oak Forrest Drive. The broken sewer main discharged untreated wastewater to waters of the state. A SSO of a nearby manhole also occurred but was reported to the Office of Water Quality Enforcement Branch.**		
INSPECTOR'S SIGNATURE: ←Click text to left to add signature	**-Inspector Name**	DATE:
SUPERVISOR'S SIGNATURE: 	**Jason Bolenbaugh**	DATE: **4/18/2022**

COLLECTION SYSTEM INSPECTION AND OVERALL RATING	**☐S ☐M ☑U ☐NA ☐NE**
PROVIDE A BRIEF DESCRIPTION OF THE COLLECTION SYSTEM: **Permittee failed to provide additional information. The collection system has nine pump stations. Stations 1 and 5 discharge directly to the treatment ponds. Stations 3, 7, 8, and 9 pump to Station 4 which then pumps to Station 5. Station 6 discharges treated effluent to the Mississippi River.**	
POPULATION SERVED/NUMBER OF RESIDENTIAL AND COMMERCIAL CONNECTIONS: **~5,817**	
FEET OF SEWER SYSTEM: **Permittee failed to provide this information.**	
AGE OF SYSTEM: **Permittee failed to provide this information.**	
DOES THE SYSTEM EXPERIENCE PROBLEMS DURING DRY OR WET WEATHER (EXPLAIN):	**☑Y ☐N ☐NA ☐NE**
IS THERE A SYSTEM IN PLACE FOR REPORTING SSOS TO ADEQ (DESCRIBE): **From January, 2019 to November, 2020 the permittee reported 63 SSOs. No SSOs have been reported since.**	**☑Y ☐N ☐NA ☐NE**
ARE ALL SSOs REPORTED REGARDLESS OF SIZE: **SSOs ranged in size from 600 gallons to 42,000 gallons. No evidence suggests all SSOs have not been reported.**	**☑Y ☐N ☐NA ☐NE**
HAVE SSOs REACHED "WATERS OF THE STATE" (LIST DATE AND LOCATION OF EACH): **Not all SSOs reported where the flows may have entered. Many noted the SSOs did enter a ditch.**	**☑Y ☐N ☐NA ☐NE**

PUMP STATIONS	**☐S ☐M ☑U ☐NA ☐NE**
NUMBER OF PUMP STATIONS IN SYSTEM: **9**	NUMBER WITH BACKUP POWER: **0**
HOW OFTEN ARE PUMP STATIONS INSPECTED/MONITORED: **It was explained the stations were inspected daily**	
ARE MAINTENANCE RECORDS AND/OR OPERATOR LOGS KEPT: **It was explained daily logs were maintained in the pump stations but this was false.**	
ADEQUATE INVENTORY OF SPARE PARTS: **No spare parts are maintained.**	
TYPE OF REMOTE ELECTRONIC MONITORING USED (I.E. SCADA OR AUTO DIALERS): **SCADA is available for all 9 stations however, the status of the stations can only be read by the operating staff at the treatment plant and is not available for monitoring remotely by off-duty staff.**	
BRIEF SUMMARY OF EMERGENCY PROCEDURES: **When problems are noted on the SCADA or by the public the operations staff will respond accordingly to an issues.**	
NUMBER OF PUMP STATIONS VISITED DURING INSPECTION (SEE ATTACHED CHECKLISTS FOR EACH): **3 – Pump Stations 1, 5, and 3.**	

SATELLITE SYSTEMS	**☑S ☐M ☐U ☐NA ☐NE**
DOES THE COLLECTION SYSTEM RECEIVE FLOW FROM SATELLITE SYSTEMS: **Long Lake**	
TYPE(S) OF WASTE WATER RECEIVED: ☑RESIDENTIAL ☑COMMERCIAL ☐INDUSTRIAL ☐OTHER:	
BRIEFLY DESCRIBE THE SATELLITE SYSTEM: **Mostly residential but there are some commercial users. All wastewater is pumped to Station 5.**	
ANY KNOWN PROBLEMS WITH SATELLITE SYSTEM: **No**	
NAME, ADDRESS AND PHONE NUMBER OF PERSON RESPONSIBLE FOR SATELLITE SYSTEM: **Not requested.**	

PUMP STATION VISIT (COMPLETE A SEPARATE CHECKLIST FOR EACH PUMP STATION VISITED)	
GENERAL INFORMATION AND OVERALL EVALUATION	**☐S ☑M ☐U ☐NA**
NAME AND/OR LOCATION OF PUMP STATION: **Pump Station 1 (Location 34.518715, -90.586334)**	
TYPE(S) OF WASTE WATER RECEIVED: ☑RESIDENTIAL ☑COMMERCIAL ☐INDUSTRIAL ☐OTHER:	
NUMBER OF PUMPS: **2**	NUMBER OPERATIONAL: **1 (Pump #2)**
NUMBER AND SIZE OF PUMPS APPEARS ADEQUATE: **75-hp**	**☑S ☐M ☐U ☐NA ☐NE**
EVIDENCE OF RECENT OVERFLOWS OR HIGH LEVELS:	**☐Y ☑N ☐NA ☐NE**
Comments: Pump #1 was not operational at the time of the inspection because the control box has failed and has not been replaced. Pump #1 run time was 14275.87 hours. Pump #2 run time was 24543.90 hours. The last entry in the log book was made on May 13, 2021. Some solids were noted around the station but those could have been removed during maintenance and not properly disposed of.	
GENERAL OPERATION AND MAINTENANCE	**☑S ☐M ☐U ☐NA**
CLEAN AND WELL MAINTAINED WITH MINIMAL STORAGE OF UNRELATED EQUIPMENT:	**☑S ☐M ☐U ☐NA ☐NE**
GATES/DOORS/HATCHES/LIDS/ETC. LOCKED TO PREVENT UNAUTHORIZED ACCESS AND/OR TAMPERING:	**☑S ☐M ☐U ☐NA ☐NE**
WET WELLS, SUMPS AND PITS ADEQUATELY COVERED, GRATED OR OTHERWISE PROTECTED:	**☑S ☐M ☐U ☐NA ☐NE**
ELECTRICAL CONTROLS COVERS CONDUIT AND EQUIPMENT PROPERLY INSTALLED AND MAINTAINED:	**☑S ☐M ☐U ☐NA ☐NE**
GUARDS AND SHIELDS IN PLACE AROUND MOVING EQUIPMENT (BELTS, PULLEYS, DRIVESHAFTS, ETC.) :	**☑S ☐M ☐U ☐NA ☐NE**
ADEQUATE VENTILATION TO PREVENT EXCESSIVE CONDENSATION AND/OR GASES AND FUMES:	**☑S ☐M ☐U ☐NA ☐NE**
ADEQUATE LIGHTING FOR ROUTINE INSPECTION/MAINTENANCE:	**☑S ☐M ☐U ☐NA ☐NE**
SEALS, VALVES AND PACKING ADEQUATELY MAINTAINED TO PREVENT LEAKS:	**☑S ☐M ☐U ☐NA ☐NE**
MINIMAL ACCUMULATION OF GREASE AND SOLIDS IN WET WELLS:	**☑S ☐M ☐U ☐NA ☐NE**
BACKUP POWER AND ALARMS	**☐S ☑M ☐U ☐NA**
PROVISIONS FOR GENERATOR AND/OR EMERGENCY TRANSFER PUMP: **Provisions are available for a portable generator to be connected.**	**☑S ☐M ☐U ☐NA ☐NE**
AUDIBLE/VISUAL ALARM WITH EMERGENCY CONTACT INFORMATION POSTED: **There are no audible or visual alarms.**	**☐S ☐M ☐U ☑NA ☐NE**
SCADA SYSTEM (LIST PARAMETERS MONITORED):	**☑Y ☐N ☐NA ☐NE**

PUMP STATION VISIT (COMPLETE A SEPARATE CHECKLIST FOR EACH PUMP STATION VISITED)	
GENERAL INFORMATION AND OVERALL EVALUATION	**☐S ☐M ☑U ☐NA**
NAME AND/OR LOCATION OF PUMP STATION: **Pump Station 5 (Location 34.494466, -90.3612703)**	
TYPE(S) OF WASTE WATER RECEIVED: ☑RESIDENTIAL ☑COMMERCIAL ☐INDUSTRIAL ☐OTHER:	
NUMBER OF PUMPS: **2**	NUMBER OPERATIONAL: **0**
NUMBER AND SIZE OF PUMPS APPEARS ADEQUATE: **60-hp**	**☐S ☐M ☑U ☐NA ☐NE**
EVIDENCE OF RECENT OVERFLOWS OR HIGH LEVELS:	**☐Y ☑N ☐NA ☐NE**
Comments: This pump station does not have a permanent pump that is operational. According to staff a 6-inch bypass pump was delivered to this location before the 2021 calendar year. The bypass pump pumps water from the wet well into the pump stations emergency bypass pipe that then allows wastewater to flow to the treatment plant.	
GENERAL OPERATION AND MAINTENANCE	**☐S ☐M ☐U ☑NA**
CLEAN AND WELL MAINTAINED WITH MINIMAL STORAGE OF UNRELATED EQUIPMENT:	**☐S ☐M ☐U ☐NA ☑NE**
GATES/DOORS/HATCHES/LIDS/ETC. LOCKED TO PREVENT UNAUTHORIZED ACCESS AND/OR TAMPERING:	**☐S ☐M ☐U ☐NA ☑NE**
WET WELLS, SUMPS AND PITS ADEQUATELY COVERED, GRATED OR OTHERWISE PROTECTED:	**☐S ☐M ☐U ☐NA ☑NE**
ELECTRICAL CONTROLS COVERS CONDUIT AND EQUIPMENT PROPERLY INSTALLED AND MAINTAINED:	**☐S ☐M ☐U ☐NA ☑NE**
GUARDS AND SHIELDS IN PLACE AROUND MOVING EQUIPMENT (BELTS, PULLEYS, DRIVESHAFTS, ETC.) :	**☐S ☐M ☐U ☐NA ☑NE**
ADEQUATE VENTILATION TO PREVENT EXCESSIVE CONDENSATION AND/OR GASES AND FUMES:	**☐S ☐M ☐U ☐NA ☑NE**
ADEQUATE LIGHTING FOR ROUTINE INSPECTION/MAINTENANCE:	**☐S ☐M ☐U ☐NA ☑NE**
SEALS, VALVES AND PACKING ADEQUATELY MAINTAINED TO PREVENT LEAKS:	**☐S ☐M ☐U ☐NA ☑NE**
MINIMAL ACCUMULATION OF GREASE AND SOLIDS IN WET WELLS:	**☐S ☐M ☐U ☐NA ☑NE**
Comments: This station is not operational and therefore this section was not evaluated.	
BACKUP POWER AND ALARMS	**☐S ☐M ☑U ☐NA**
PROVISIONS FOR GENERATOR AND/OR EMERGENCY TRANSFER PUMP:	**☐S ☐M ☐U ☐NA ☑NE**
AUDIBLE/VISUAL ALARM WITH EMERGENCY CONTACT INFORMATION POSTED:	**☐S ☐M ☑U ☐NA ☐NE**
SCADA SYSTEM (LIST PARAMETERS MONITORED):	**☐Y ☑N ☐NA ☐NE**
Comments: The light bulb for the visual alarm was not installed. The SCADA for this station was not operational. If the station experiences a problem such as an overflow the permittee relies on staff to find it when they arrive to fuel the bypass pump or if a nearby resident contacts them.	

PUMP STATION VISIT (COMPLETE A SEPARATE CHECKLIST FOR EACH PUMP STATION VISITED)	
GENERAL INFORMATION AND OVERALL EVALUATION	**☐S ☐M ☑U ☐NA**
NAME AND/OR LOCATION OF PUMP STATION: **Pump Station 3 (Location 34.535115, -90.626676**	
TYPE(S) OF WASTE WATER RECEIVED: ☑RESIDENTIAL ☐COMMERCIAL ☐INDUSTRIAL ☐OTHER:	
NUMBER OF PUMPS: **2**	NUMBER OPERATIONAL: **0**
NUMBER AND SIZE OF PUMPS APPEARS ADEQUATE: **60-hp**	**☐S ☐M ☑U ☐NA ☐NE**
EVIDENCE OF RECENT OVERFLOWS OR HIGH LEVELS:	**☐Y ☑N ☐NA ☐NE**
Comments: This pump station does not have a permanent pump that is operational. According to staff an 8-inch bypass pump has been on site since at least March, 2021. The bypass pump pumps water from the wet well into the pump stations emergency bypass pipe that then allows wastewater to Pump Station 5. The permittee has been working on this pump station to install new internal components such as pump baring and impellers. In order to make the primary pump operational a baring will need replaced but Gorman Rupp needs to evaluate the secondary pump to determine what repairs need to made to it to make it operational.	
GENERAL OPERATION AND MAINTENANCE	**☐S ☐M ☑U ☐NA**
CLEAN AND WELL MAINTAINED WITH MINIMAL STORAGE OF UNRELATED EQUIPMENT:	**☐S ☐M ☐U ☐NA ☑NE**
GATES/DOORS/HATCHES/LIDS/ETC. LOCKED TO PREVENT UNAUTHORIZED ACCESS AND/OR TAMPERING:	**☐S ☐M ☐U ☐NA ☑NE**
WET WELLS, SUMPS AND PITS ADEQUATELY COVERED, GRATED OR OTHERWISE PROTECTED:	**☐S ☐M ☐U ☐NA ☑NE**
ELECTRICAL CONTROLS COVERS CONDUIT AND EQUIPMENT PROPERLY INSTALLED AND MAINTAINED:	**☐S ☐M ☐U ☐NA ☑NE**
GUARDS AND SHIELDS IN PLACE AROUND MOVING EQUIPMENT (BELTS, PULLEYS, DRIVESHAFTS, ETC.) :	**☐S ☐M ☐U ☐NA ☑NE**
ADEQUATE VENTILATION TO PREVENT EXCESSIVE CONDENSATION AND/OR GASES AND FUMES:	**☐S ☐M ☐U ☐NA ☑NE**
ADEQUATE LIGHTING FOR ROUTINE INSPECTION/MAINTENANCE:	**☐S ☐M ☐U ☐NA ☑NE**
SEALS, VALVES AND PACKING ADEQUATELY MAINTAINED TO PREVENT LEAKS:	**☐S ☐M ☐U ☐NA ☑NE**
MINIMAL ACCUMULATION OF GREASE AND SOLIDS IN WET WELLS:	**☐S ☐M ☐U ☐NA ☑NE**
Comments: This station is not operational and therefore this section was not evaluated.	
BACKUP POWER AND ALARMS	**☐S ☐M ☑U ☐NA**
PROVISIONS FOR GENERATOR AND/OR EMERGENCY TRANSFER PUMP:	**☐S ☑M ☐U ☐NA ☐NE**
AUDIBLE/VISUAL ALARM WITH EMERGENCY CONTACT INFORMATION POSTED:	**☐S ☐M ☐U ☐NA ☑NE**
SCADA SYSTEM (LIST PARAMETERS MONITORED):	**☑Y ☐N ☐NA ☐NE**
Comments: There is not a backup generator connection available at this station. The permittee requires the bypass pump to be delivered to the location in the event of an emergency. Mr. Patterson said the wet well depth can still be monitored by SCADA at this location.	

Office of Water Quality Photographic Evidence Sheet					
Location:	**City of Helena**				
Photographer:	**Jason Bolenbaugh**	Date:	**3/22/2022**	Time:	**1047**
Witness:				Photo #:	**1**
Description:	**DSCN3726: Pump Station 1.**				

Photographer:	**Jason Bolenbaugh**	Date:	**3/2/2022**	Time:	**1056**
Witness:				Photo #:	**2**
Description:	**DSCN3737: Closer view of one of the pumps in Pump Station 1.**				

Office of Water Quality Photographic Evidence Sheet					
Location:	**City of Helena**				
Photographer:	**Jason Bolenbaugh**	Date:	**3/2/2022**	Time:	**1059**
Witness:				Photo #:	**3**
Description:	**DSCN3741: Pump station control panel and boxes (one missing). The control box (black box) for Pump 1 has been removed from the wall.**				

Photographer:	**Jason Bolenbaugh**	Date:	**3/2/2022**	Time:	**1055**
Witness:				Photo #:	**4**
Description:	**DSCN3736: Pump 1 control box on the floor of the pump station.**				

Office of Water Quality Photographic Evidence Sheet					
Location:	**City of Helena**				
Photographer:	**Jason Bolenbaugh**	Date:	**3/2/2022**	Time:	**1055**
Witness:				Photo #:	**5**
Description:	**DSCN3732: Wet well level reading at 4.1 feet.**				

Photographer:	**Jason Bolenbaugh**	Date:	**3/2/2022**	Time:	**1057**
Witness:				Photo #:	**6**
Description:	**DSCN3739: View of wastewater in the wet well.**				

Office of Water Quality Photographic Evidence Sheet					
Location:	**City of Helena**				
Photographer:	**Jason Bolenbaugh**	Date:	**3/2/2022**	Time:	**11:14**
Witness:				Photo #:	**7**
Description:	**DSCN3743: Overview of Pump Station 5. The pump station is in operable. The orange bypass pump has been used since before the 2021 calendar year.**				

Photographer:	**Jason Bolenbaugh**	Date:	**3/2/2022**	Time:	**1114**
Witness:				Photo #:	**8**
Description:	**DSCN3744: Bypass pump used to pump wastewater from Pump Station 5 to the treatment plant.**				

Office of Water Quality Photographic Evidence Sheet					
Location:	**City of Helena**				
Photographer:	**Jason Bolenbaugh**	Date:	**3/2/2022**	Time:	**1118**
Witness:				Photo #:	**9**
Description:	**DSCN3746: Visual alarm not in operation.**				

Photographer:	**Jason Bolenbaugh**	Date:	**3/2/2022**	Time:	**1138**
Witness:				Photo #:	**10**
Description:	**DSCN3748: View of Pump Station 3.**				

Office of Water Quality Photographic Evidence Sheet					
Location:	**City of Helena**				
Photographer:	**Jason Bolenbaugh**	Date:	**3/2/2022**	Time:	**1138**
Witness:				Photo #:	**11**
Description:	**DSCN3749: View of the bypass pump at Pump Station 3.**				

Photographer:	**Jason Bolenbaugh**	Date:	**3/2/2022**	Time:	**1144**
Witness:				Photo #:	**12**
Description:	**DSCN3750: Wastewater being pumped from the wet well (background) over to the pipe (foreground) sending wastewater to Pump Station 5.**