



ARKANSAS

ENERGY & ENVIRONMENT

CERTIFIED MAIL:9489009000276186088746

August 25, 2023

Robert Tharp, Mayor
City of Decatur
P.O. Box 247
Decatur, AR 72722
James.boston@decaturarkansas.com

RE: City of Decatur WWTP Inspection (Benton Co)
AFIN: 04-00052 **NPDES Permit No.: AR0022292**

Dear Honorable Mayor Robert Tharp:

On July 27, 2023, I performed a Reconnaissance 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 case has been referred directly to the Office of Water Quality - Enforcement Branch for further review. City of Decatur should immediately initiate all actions necessary to resolve and correct the violations cited in the inspection report. Written notification of the corrective actions taken for the 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 Richard.Healey@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 William.cody@adeq.state.ar.us or (501) 944-2569.

Sincerely,

A handwritten signature in blue ink that reads "Will Cody".

William Cody
Inspector, Office of Water Quality
5301 Northshore Drive, North Little Rock, AR, 72118

 ENVIRONMENTAL QUALITY	OFFICE OF WATER QUALITY		
	INSPECTION REPORT		
	AFIN: 04-00052	PERMIT #: AR0022292	DATE: 7/27/2023
	COUNTY: 04 Benton	PDS #: 126876	MEDIA: WN
GPS LAT: 36.343294 LONG: -94.471183 LOCATION: Entrance			
FACILITY INFORMATION		INSPECTION INFORMATION	
NAME: City of Decatur WWTP LOCATION: 985 Austin Ave. CITY: Decatur		FACILITY TYPE: 1 - Municipal INSPECTOR ID#: 142257 S - State FACILITY EVALUATION RATING: 1 - Unsatisfactory INSPECTION TYPE: Reconnaissance	
RESPONSIBLE OFFICIAL		DATE(S): 7/27/2023 ENTRY TIME: 22:06 EXIT TIME: 22:12 PERMIT EFFECTIVE DATE: 11/30/2020 7/27/2023 23:20 23:26 PERMIT EXPIRATION DATE: 11/30/2025	
NAME: / TITLE Robert Tharp / Mayor COMPANY: City of Decatur MAILING ADDRESS: P.O. Box 247 CITY, STATE, ZIP: Decatur AR 72722 PHONE & EXT: / FAX: 479-752-3912 / EMAIL: james.boston@decaturarkansas.com		FAYETTEVILLE SHALE RELATED: N FAYETTEVILLE SHALE VIOLATIONS: N INSPECTION PARTICIPANTS NAME/TITLE/PHONE/FAX/EMAIL/ETC.: James Boston, Public Works Director, 479-212-0726, james.boston@decaturarkansas.com William Cody, Area 1 Inspector, 501-944-2569, william.cody@adeq.state.ar.us	
CONTACTED DURING INSPECTION: No			
AREA EVALUATIONS			
(S=Satisfactory, M=Marginal, U=Unsatisfactory, N=Not Applicable/Evaluated)			
N	PERMIT	N	FLOW MEASUREMENT
N	RECORDS/REPORTS	N	LABORATORY
M	OPERATION & MAINTENANCE	M	EFFLUENT/RECEIVING WATER
N	SAMPLING	N	SLUDGE HANDLING/DISPOSAL
**	OTHER:	N	STORMWATER
		N	FACILITY SITE REVIEW
		N	SELF-MONITORING PROGRAM
		N	PRETREATMENT

SUMMARY OF FINDINGS	
<p>The following items were noted and require a written and photographic response:</p> <ol style="list-style-type: none"> 1. There is evidence of a recent SSO at the influent lift station. It is required that this overflow be reported to the Enforcement Branch, per Part II, 5.A of the permit. 2. Trash and debris are evident in the area surrounding the influent lift station. It is required that this area be cleaned in order to maintain proper operation and maintenance requirements, per Part III, B.1.A of the permit. 	

GENERAL COMMENTS

On July 27, 2023, I conducted an inspection at the City of Decatur WWTP in response to a complaint. Mr. James Boston, Public Works Director, accompanied me during the inspection. I made two site visits to the treatment plant and investigated the outfall and the influent lift station.

During my initial site visit, I met with Mr. Boston at the Decatur WWTP. Mr. Boston showed me the treatment plant's outfall into Columbia Hollow Creek, approximately just under one mile from the complaint location. The effluent appeared clear and the receiving stream did not appear to have any sludge accumulation or any other indications of an overflow. I then left the facility to meet with the complainant at the reported location of concern downstream.

After my site visit with the complainant, I returned to the Decatur WWTP and again met with Mr. Boston. We then looked at the influent lift station as requested by the Inspector Supervisor and Enforcement Branch. The influent lift station had clear indications of overflows, as there is trash on the ground surrounding the lift station. Mr. Boston explained to me that O6 Environmental would be remediating this area the following morning. It is requested that the City of Decatur WWTP provide an update on the remediation efforts made by O6 Environmental. Mr. Boston also explained that overflows will occur at the plant where the overflow will flow over and down the walls of the raised concrete platform onto the ground. I asked how long it has been since a previous overflow and the statement of "it has been a little while" was received. The EQ basin is said to not be in operation and/or not of use currently. Mr. Boston said they have not had any issues with the EQ basin since it has not been of use.

Per the request of the Office of Water Quality - Enforcement Branch, Mr. Boston has submitted samples from the treatment plant and he has also made a site visit to the reported area of concern downstream to collect and submit a sample to DEQ – OWQ.

INSPECTOR'S SIGNATURE: <i>Will Cody</i> William Cody	DATE: 8/8/2023
SUPERVISOR'S SIGNATURE: <i>Kerri McCabe</i> Kerri McCabe	DATE: 8/21/2023

Office of Water Quality Photographic Evidence Sheet

Location:	City of Decatur WWTP		
Photographer:	William Cody	Date:	7/27/2023
Witness:	James Boston	Time:	23:24
		Photo #:	1
Description:	Influent lift station area.		



Photographer:	William Cody	Date:	7/27/2023
Witness:	James Boston	Time:	23:21
		Photo #:	2
Description:	Trash, debris, and other evidence of an SSO on the grounds next to the lift station.		



Office of Water Quality Photographic Evidence Sheet

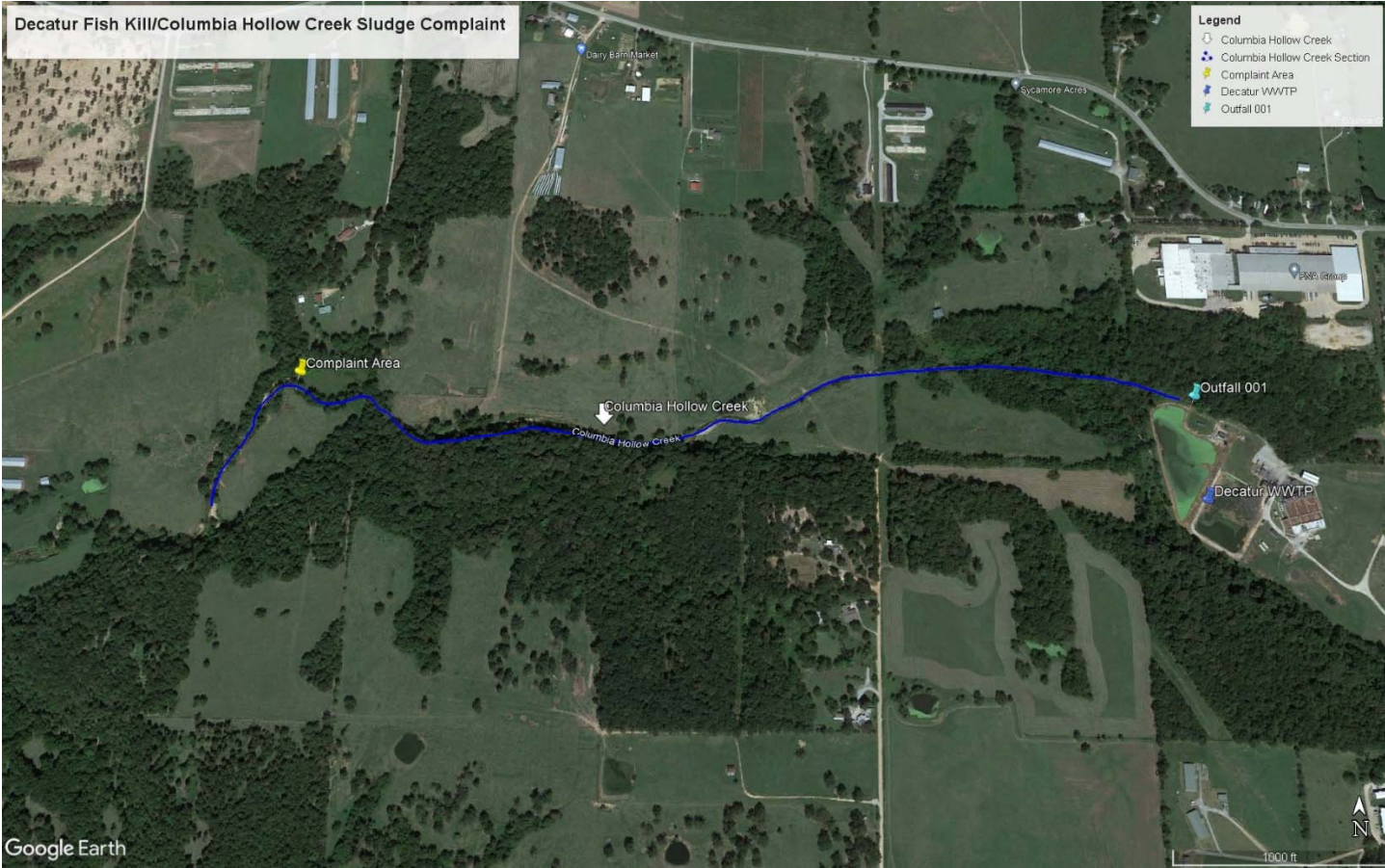
Location:	City of Decatur WWTP				
Photographer:	William Cody	Date:	7/27/2023	Time:	23:21
Witness:	James Boston	Photo #:	3		
Description:	View of treatment units/components on the raised concrete platform.				



Photographer:	William Cody	Date:	7/27/2023	Time:	22:08
Witness:	James Boston	Photo #:	4		
Description:	Outfall 001.				



Attachment 1. Google Earth photo depicting the complaint/fish kill/sludge accumulation location, Columbia Hollow Creek, and the Decatur WWTP and associated outfall.



From: Richard Healey (adpce.ad)
Sent: Thursday, October 5, 2023 7:48 AM
To: Uniqika Marshall (adpce.ad)
Cc: William Cody (adpce.ad); Thomas Harrington (adpce.ad)
Subject: FW: Decatur AR Follow Up
Attachments: Scan0452.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Uniqika

Please save a copy of the attachment which is Decatur Inspection response to Will Cody's July 27 2023 Inspection (126876).

Thanks

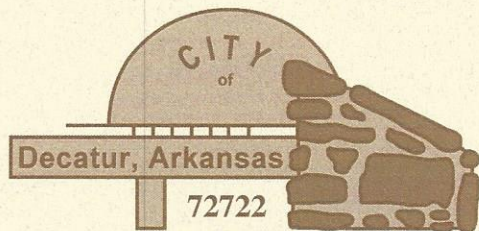
From: James Boston <JBoston@decaturar.us>
Sent: Wednesday, October 4, 2023 4:36 PM
To: Richard Healey (adpce.ad) <Richard.Healey@adeq.state.ar.us>
Subject: Decatur AR Follow Up

Mr. Healey,

I have attached the response for the issues the Decatur Wastewater Treatment Plant had recently. If I have left anything out or you need anything further. Please let me know. If you have any questions or concerns please give me a call. Thank you for the extended time to get this report out to your department.

Respectfully,

James Boston
Public Works Manager
City of Decatur



310 Maple Avenue • Box 247
Phone: (479) 752-3912

October 3, 2023

Mr. Richard Healey
Enforcement Branch
5301 Northshore Drive
North Little Rock AR 72118

RE: Inspection Follow UP AFIN: 04-00052, NPDES Permit No.: AR0022292

Dear Mr. Healey,

I will do my best to address what we have accomplished since Mr. Cody's inspection on July 27, 2023, and the Zoom meeting you had with myself, Mayor Tharp, and our Design Build team, which is working on the current and long-term solutions.

The problems we have with overflows or potential overflows are listed below in a few narrow problems. Our challenge is how to manage these areas better before our upgrade, and make sure we deal with them during the upgrade to prevent them from happening again. Mr. Healey I can assure you we are trying to solve problems now, and are making strides, but I believe solving these main issues will prevent almost all of the other problems we have not had yet by catching them sooner. Most of the time I feel like we put out some of the best effluent to the creek of anybody, especially with our loading. Here is some of our biggest issues and what we are working on to fix them...

1. **Electrical Surges:** We all too often have storms like everyone else that seem bigger and more intense. Lightning has not direct hit us in years, however we get surges that turn off equipment, or cause some of the more sensitive equipment to fault, needing to be reset. Usually, these surges or blips are quick, the backup generator not even being called for. When this happens, some equipment may not restart on its own.
 - A. **Possible Solutions:** I have reached out to a company called SineTamer to supply us with simple surge suppressors for each of our HMI or control panels around the plant, to absorb these power fluctuations when they occur. For \$2,800 we are going to make this happen soon. This is one of the big areas that cause us problems especially during storms. Alarm improvement will also help us.
2. **Alarm Improvements:** This problem is two part. During storms we have had the internet shut down due to lightning or other. When this happens, problems do not get sent out. If the internet gets knocked out, it is likely as stated above, other equipment gets shup off and does not restart. The other problem has been more recent. Equipment may send out an alarm, but for whatever

reason it does not make it through the computers and network, to the off-duty person who could respond.

- A. **Possible Solutions:** If it is after hours, and internet is lost. I got out of bed recently when this happened and went to the plant until other employees arrived. Or the internet was restored so that remote access was available. We have a good internet service that is underground, interruption of service has been rare. One other idea getting strong consideration is to add a different service all together, that could let us know of high basin levels that may occur from storms or equipment failure. And adding other critical alarm items into the alert system during the expansion will go a long way to prevent future issues.
- 3. **Screening Issues:** This is one of our biggest issues, that is driving our upcoming expansion more that flow increases. Our secondary screens looked like good equipment on paper, but not in reality. We have improved our primary screen to protect our pump station and secondary screens. But wipes and ragging has plagued us since the COVID year. This for the most part, is not in SCADA, and this is a problem, especially on problem notification. We have added a "De-ragger" system to our influent pump station recently, and this has been a tremendous help. When a pump starts to clog from rags, it stops, reverses and usually releases the rag.
- 4. **Influent Pump Station:** This has been a past problem, due to getting repairs and parts. Our pump station is not SCADA connected. This station size, both volume and pumping capacity is an issue when large rain events happen.
 - A. **Solutions:** A huge focus of our upcoming upgrades is getting water into the plant. This is my single biggest concern during storms and flooding. We will have a new influent pump station and screening upon completion of our upgrade, with SCADA connection. In the mean time we do have a camera that observes the station, but preventing problems here will be a challenged until upgraded.

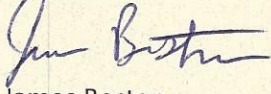
These are some of the main reasons water can overflow and get away from treatment. We recently spent a lot of money for grounds clean up. And will do more when necessary.

I would like to add that we now have from 4 am until 7 pm coverage Monday-Friday at the wastewater facility. Weekends when our large industry is not working, we have not had any issues. We do on-calls to the facility daily on weekends and holidays. We are looking however at ways to get more hours on-site if we do not feel like we are able to address the above issues. One way we have done this is to add cameras at the facility, we now have 16 of them, that gives me another way to monitor the plant. I am currently looking at motions sensing camera's that would alarm me if water reached an area of a basin that is not normally covered by water. This would help us prevent basin overflows with a second alert.

We are striving to never have any overflow issues; our upcoming upgrade will go a long way with what we have learned since the last expansion. This will also free up our equalization basin so the we can only use it during large rain events or plant problems. We should be submitting drawings for your departments review by the end of October 2023.

If I have left anything out of this response, please let me know and I will get a response to you promptly. Please let me know if you have any question or concerns.

Respectfully,

A handwritten signature in dark ink, appearing to read "James Boston". The signature is fluid and cursive, with a prominent initial "J" and a long, sweeping underline.

James Boston
Public Works Manager
City of Decatur