

Richard Healey (adpce.ad)

From: Terry Long <eswwtp@yahoo.com>
Sent: Friday, October 13, 2023 4:14 PM
To: Richard Healey (adpce.ad); Butch Berry; Simon Wiley
Cc: 'terry.paul@arkansas.gov'; 'lance.Jones@arkansas.gov'; 'Craig.Corder@arkansas.gov'; Bryan Leamons (adpce.ad); Jason Bolenbaugh (adpce.ad); Zane Lewis; Stacie Wassell (adpce.ad); SSOADEQ
Subject: Re: City of Eureka Springs, NPDES Permit Number: AR0021865, AFIN: 08-00036, Request for Interim Measures, Bacteria Sampling, Communication Plan and Corrective Action Plan
Attachments: Permit AR0021865 AFIN 08-00036 #2-#4.docx

Richard,

At your convenience, please review the attached document addressing action #2, #3 and #4 from the letter we received on Wednesday. If additional information is required, or corrections need to be made, please let me know and I will reply as quickly as possible.

Thank you for your assistance with this issue.

Thank you,

Terry Long, Plant Manager
Eureka Springs WWTP
100 Highway 23 N.
Eureka Springs, AR 72632
479-253-7410 - Office
479-738-7035 - Cell
479-253-6974 - Fax
eswwtp@yahoo.com

Eureka Springs WWTP
Eureka Springs Public Works Dept.
3174 E. Van Buren
Eureka Springs, AR 72632
479-253-9600 - Office
479-253-6974 - Fax

On Friday, October 13, 2023 at 03:15:32 PM CDT, Simon Wiley <swiley@eurekaspringsar.gov> wrote:

Richard,

Attached is the newly enacted SOP for SSOs at the WWTP. Let me know if you would like for me to make any modifications or improvements to this.

Thank you all for working with me and helping design this new SOP for overflows at the plant!

Sincerely,

Simon Wiley, CPM

Director of Public Works

City of Eureka Springs, Arkansas

3174 East Van Buren

Eureka Springs, AR 72632

P: 479.253.9600

C: 479.981.0707

swiley@eurekaspringsar.gov

“Unless someone like you cares a whole awful lot, nothing is going to get better. It’s not.” – **Dr. Seuss**

From: Richard Healey (adpce.ad) <Richard.Healey@adeq.state.ar.us>

Sent: Thursday, October 12, 2023 2:07 PM

To: Simon Wiley <swiley@eurekaspringsar.gov>; Butch Berry <mayor@eurekaspringsar.gov>

Cc: eswwtp <eswwtp@yahoo.com>; 'terry.paul@arkansas.gov' <terry.paul@arkansas.gov>; 'lance.Jones@arkansas.gov' <lance.Jones@arkansas.gov>; 'Craig.Corder@arkansas.gov' <Craig.Corder@arkansas.gov>; Bryan Leamons (adpce.ad) <Bryan.Leamons@adeq.state.ar.us>; Jason Bolenbaugh (adpce.ad) <Jason.Bolenbaugh@adeq.state.ar.us>; Zane Lewis <zlewis@mce.us.com>; Stacie Wassell (adpce.ad) <Stacie.Wassell@adeq.state.ar.us>

Subject: RE: City of Eureka Springs, NPDES Permit Number: AR0021865, AFIN: 08-00036, Request for Interim Measures, Bacteria Sampling, Communication Plan and Corrective Action Plan

Simon

The City of Eureka Springs NPDES Permit AR0021865, Part II, Condition 6, states any SSO (or any amount) if it discharges to waters of the state must be reported to DEQ with 24 hrs and therefore the conditions in the DEQ’s letter date October 11, 2023, must be undertaken for any SSO (Bypass, Upset Condition or Unpermitted discharge) at the WWTP which discharges to Leatherwood Creek. The 15,000 gallon amount is not appropriate.

Sanitary Sewer Overflow (SSO) Reporting Requirements:

A. A sanitary sewer overflow is any spill, release or diversion of wastewater from a sanitary

sewer collection system including:

1. Any overflow, whether it discharges to the waters of the state or not.
2. An overflow of wastewater, including a wastewater backup into a building (other than a backup caused solely by a blockage or other malfunction in a privately owned sewer or building lateral), even if that overflow does not reach waters of the state

<https://www.adeg.state.ar.us/downloads/WebDatabases/PermitsOnline/NPDES/Permits/AR0021865.pdf>

Please call me at your earliest convenience.

Thanks

Richard C. Healey | Enforcement Branch Manager

Division of Environmental Quality | **Office of Water Quality**

5301 Northshore Drive | North Little Rock, AR 72118

t: 501-682-0640 | e: richard.healey@adeq.state.ar.us



ARKANSAS
ENERGY & ENVIRONMENT

From: Simon Wiley <swiley@eurekaspringsar.gov>

Sent: Thursday, October 12, 2023 1:03 PM

To: Butch Berry <mayor@eurekaspringsar.gov>; Richard Healey (adpce.ad) <Richard.Healey@adeq.state.ar.us>

Cc: eswwtp <eswwtp@yahoo.com>; 'terry.paul@arkansas.gov' <terry.paul@arkansas.gov>; 'lance.Jones@arkansas.gov' <lance.Jones@arkansas.gov>; 'Craig.Corder@arkansas.gov' <Craig.Corder@arkansas.gov>; Bryan Leamons (adpce.ad) <Bryan.Leamons@adeq.state.ar.us>; Jason Bolenbaugh (adpce.ad) <Jason.Bolenbaugh@adeq.state.ar.us>; Zane Lewis <zlewis@mce.us.com>

Subject: RE: City of Eureka Springs, NPDES Permit Number: AR0021865, AFIN: 08-00036, Request for Interim Measures, Bacteria Sampling, Communication Plan and Corrective Action Plan

Richard,

Please take a moment to review the attached documents and let me know if this will be satisfactory to meet action 5 from the letter we received yesterday. If I need to make any modifications to the attached documents, I will do so and return them to you as soon as possible.

Thanks,

Simon Wiley, CPM

Director of Public Works

City of Eureka Springs, Arkansas

3174 East Van Buren

Eureka Springs, AR 72632

P: 479.253.9600

C: 479.981.0707

swiley@eurekaspringsar.gov

“Unless someone like you cares a whole awful lot, nothing is going to get better. It’s not.” – **Dr. Seuss**

From: Butch Berry <mayor@eurekaspringsar.gov>

Sent: Wednesday, October 11, 2023 4:47 PM

To: Simon Wiley <swiley@eurekaspringsar.gov>; Richard Healey (adpce.ad) <Richard.Healey@adeq.state.ar.us>

Cc: eswwtp <eswwtp@yahoo.com>; 'terry.paul@arkansas.gov' <terry.paul@arkansas.gov>; 'lance.Jones@arkansas.gov' <lance.Jones@arkansas.gov>; 'Craig.Corder@arkansas.gov' <Craig.Corder@arkansas.gov>; Bryan Leamons (adpce.ad) <Bryan.Leamons@adeq.state.ar.us>; Jason Bolenbaugh (adpce.ad) <Jason.Bolenbaugh@adeq.state.ar.us>; Zane Lewis <zlewis@mce.us.com>

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We have Received your notice and Simon Wiley, Public Works director will be responding to your concerns and comments.

thank you.

Robert D. "Butch" Berry

Mayor

44 S. Main St.

Eureka Springs, AR 72632

479-253-9703 (O)

479-253-1854 (C)

From: Simon Wiley <swiley@eurekaspringsar.gov>

Sent: Wednesday, October 11, 2023 3:19 PM

To: Richard Healey (adpce.ad) <Richard.Healey@adeq.state.ar.us>; Butch Berry <mayor@eurekaspringsar.gov>

Cc: eswwtp <eswwtp@yahoo.com>; 'terry.paul@arkansas.gov' <terry.paul@arkansas.gov>; 'lance.Jones@arkansas.gov' <lance.Jones@arkansas.gov>; 'Craig.Corder@arkansas.gov' <Craig.Corder@arkansas.gov>; Bryan Leamons (adpce.ad) <Bryan.Leamons@adeq.state.ar.us>; Jason Bolenbaugh (adpce.ad) <Jason.Bolenbaugh@adeq.state.ar.us>; Zane Lewis <zlewis@mce.us.com>

Subject: RE: City of Eureka Springs, NPDES Permit Number: AR0021865, AFIN: 08-00036, Request for Interim Measures, Bacteria Sampling, Communication Plan and Corrective Action Plan

Please find attached, a copy of our letter acknowledging receipt of the corrective action letter dated 10/11/23.

Simon Wiley, CPM

Director of Public Works

City of Eureka Springs, Arkansas

3174 East Van Buren

Eureka Springs, AR 72632

P: 479.253.9600

C: 479.981.0707

swiley@eurekaspringsar.gov

“Unless someone like you cares a whole awful lot, nothing is going to get better. It’s not.” – **Dr. Seuss**

From: Richard Healey (adpce.ad) <Richard.Healey@adeq.state.ar.us>
Sent: Wednesday, October 11, 2023 1:10 PM
To: Butch Berry <mayor@eurekaspringsar.gov>
Cc: Simon Wiley <swiley@eurekaspringsar.gov>; eswwtp <eswwtp@yahoo.com>; 'terry.paul@arkansas.gov' <terry.paul@arkansas.gov>; 'lance.Jones@arkansas.gov' <lance.Jones@arkansas.gov>; 'Craig.Corder@arkansas.gov' <Craig.Corder@arkansas.gov>; Bryan Leamons (adpce.ad) <Bryan.Leamons@adeq.state.ar.us>; Jason Bolenbaugh (adpce.ad) <Jason.Bolenbaugh@adeq.state.ar.us>
Subject: City of Eureka Springs, NPDES Permit Number: AR0021865, AFIN: 08-00036, Request for Interim Measures, Bacteria Sampling, Communication Plan and Corrective Action Plan

Good Afternoon Mayor Berry:

Please see the attached letter to the City of Eureka Springs.

Please respond to this email to verify that you have received it.

If you have any questions regarding this matter, please do not hesitate to ask.

Thanks

Richard C. Healey | Enforcement Branch Manager

Division of Environmental Quality | Office of Water Quality
5301 Northshore Drive | North Little Rock, AR 72118

t: 501-682-0640 | e: richard.healey@adeq.state.ar.us



Permit AR0021865 AFIN 08-00036

ACTION #2

We believe that the unpermitted discharges have been eliminated at this time. The last time we had an unpermitted discharge was September 20, 2023, so it has been three weeks since our last unpermitted discharge. We believe the unpermitted discharges have been eliminated for a couple of reasons: 1 – The MLSS numbers have been reduced as a result of increased sludge wasting; and 2 – The issue with erroneous water level readings in our SBR basins has been resolved with the location of a faulty connection between the pressure transducer and the wiring connecting to the PLC which controls the operation of influent and effluent valves, the blowers and motive pumps. I have not taken pictures of our post aeration basin prior to disinfection and discharge, or of the discharge during a decant event from the creek level, but plan to take those pictures first of next week and forward them to you.

ACTION #3

The bacteria sampling requested in action #3 was initiated today. We were unable to begin on Thursday because we had to acquire additional sterile sample bottles from our contract laboratory before we could begin the sampling process. This delay also allowed them a chance to make changes to the work schedule of employees to accommodate receiving samples and performing test analyses on the weekend. We have made plans with our employees to continue the sampling process until we have test results for two consecutive tests that meet the sample result criteria of less than 126 colonies per 100-ml.

ACTION #4

The monitoring and sampling as requested in action #4 will be continued until the results from the sampling on two consecutive testing dates meet the water criteria requirements of less than 126 E. coli bacteria per 100-ml of sample. We will pull samples at least every three (3) calendar days with the lab results and chain of custody emailed to the Arkansas DEQ Office of Water Quality Enforcement Branch upon receipt of lab results. The GPS coordinates for each sample have been added to the chain of custody as part of the sample identification.