

City of Eureka Springs

Public Works Department
3174 East Van Buren Street
Eureka Springs, Arkansas 72632

Office of the Director, Dwayne Allen
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June 10, 2015

Layne Pemberton
Water Division Enforcement Section, ADEQ
5301 Northshore Drive
North Little Rock, AR 72118

RE: NPDES Permit Number AR0021865, Corrective Action Plan

Ms. Pemberton,

The City of Eureka Springs was recently removed from Administrative Order LIS No. 07-100 AFIN 08-0036, we have made great strides over the last six years and proven that we can meet state and federal regulations and that the sequencing batch reactors can meet our NPDES limits.

The City of Eureka Springs has reviewed the discharge monitoring reports from the last three years and has agreed a corrective action plan, an update of current policy, and refocusing of our policies and goals is in order. I have enclosed summary of each incident in this time period.

I was able to receive extra funding in the amount of \$475,000 for this year. I am utilizing the funds to repair the system areas identified as critical, add needed wastewater chemical storage, place our SCADA on radio feed, off land lines, and most importantly, replace the deficient water meters in the system. These changes, when fully implemented will increase our revenue and greatly decrease our loss. We will always have to utilize our resources wisely, due to long term debt and the number and type of our consumers. It has been a challenge but I believe I have funding in place to continue to improve our systems.

The first priority is to maintain our effluent within the permitted nutrient removal levels, at all times. Upon review several incidents were group related and caused by equipment failure. Our plan is to not have any exceedances by 01/2016. We will focus on preventive maintenance by logging tasks and trends. We will review our spare parts list. We will install an 8" water line to the WW Plant; the two inch feed is inadequate. We will install a bulk chemical feed system and increase our daily monitoring. We will again explore basin timings related to our chemical feeds and increase if warranted. We will review our settings during climate change and our large BOD increase during weekends and seasonal festivals. I have confidence in my manager and staff to achieve our goals and I will seek advice from my peers and colleagues, as I have in the past, if we encounter problems beyond our capabilities. An SBR system is much more sensitive than a convention activated sludge,

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racetrack plant and should have more probes in the basin for continuous monitoring, but I cannot justify the cost at this time, with the many needs we have in our systems. Of course the I&I is still being improved and does affect our equipment and timings, as it is a flow based system and our settlable times are effected on large influents. I have used a camera on a small portion of the collection system but we must check the entire system that is covered in the response to SSO's.

In the past three years we have experienced eighteen sanitary sewer overflows. Our plan is not to have any overflows by March, 2018, the start of our next NPDES permit. We address each incident and have made numerous spot repairs over the last few years. We have stopped most repeat overflows. I will camera the collection mains, with the assistance of a local contractor and utilize spot smoke testing to avoid unprectible overflows.

The first goal is to be ready for large weather events, as that has been a theme in our overflows. We will continue to reserve funding to camera our lines, add rain bonnets, raise manholes, and perform routine maintenance, such as jet flat areas of main line. Our added alarms and increased maintenance to our lift stations has solved most of those issues.

By 01/2016 our plan will review and update our Sewer System Overflow Response Plan and create a Capacities Management Operations Maintenance Plan. We will also create a Sanitary Sewer Overflow Evaluation Report; this will allow us to address them quickly and efficiently. The main goal is to update our plan as needed, with a yearly minimum time frame. We must make this a living, breathing document.

I have requested a twenty-five cent rate increase on water and wastewater for this year. We are also are requesting our fees be increased for taps and deposits. We have sent letters to all our customers encouraging them to explore buying service line insurance with the National League of Cities. We have proposed an ordinance to have wastewater systems certified when any property is transferred in our system, before water service is reestablished. We would also require backwater valves if needed at that point. I am exploring regional solids handling and hoping the new nutrient sharing law, once implemented will help the minor permit holders as well.

I believe the key to our action plan is to refocus and review where we are and not to lose focus of our goals. We must now plan and execute the plan. The personnel, funding, and equipment must all be reviewed and any changes and additions planned for. Please advise me of any changes or additions that are needed.

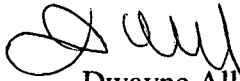
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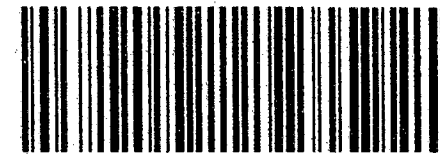
Sincerely,



Dwayne Allen,
Public Works director

City of Eureka Springs
Department of Public Works
3174 East Van Buren
Eureka Springs, AR 72632-9498

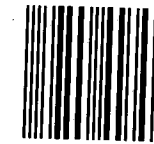
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