

Johnson, Miles

From: Healey, Richard
Sent: Thursday, May 17, 2018 1:48 PM
To: Monty Ledbetter (MLedbetter@cityhs.net)
Cc: Osborne, Caleb; Allen-Daniel, Leslie
Subject: Hot Springs CAO LIS 08-099 closure review
Attachments: Hot Springs Main WWTP AR0033880 SSO Reports.xlsx; Hot Springs Southwest AR0050148, SSO Report.xlsx; AR0050148 City of Hot Springs Overflow Information.docx; AR0033880 City of Hot Springs Overflow Information.docx

Monty

On November 14, 2017 and January 24, 2018, the City of Hot Springs submitted requests to terminate CAO LIS 08-099. While the City of Hot Springs has significantly reduced the number of SSOs in the Priority 1 targeted projects, the Department requests the following additional information in order to complete our review:

1. During our review of the SSOs reported from 2015-2018 for NPDES Permits AR0033880 and AR0050148, we have identified approximately 137 SSO reports that may be duplicate reports, please review our list and the list of SSOs reports for the period 2015-2018. Please review the attached lists and spreadsheets to confirm the duplicate reports. Upon your confirmation, we will delete any duplicate record.
2. Of the SSOs reported for the period 2015-2018, please identify which are capacity or non-capacity SSOs.
 - a. Capacity Related SSOs. For each year, please identify how many and the date(s) of the rain events measured above the design storm threshold and how many SSOs occurred during those events. Also, how many SSOs occurred below the design storm threshold?

Please provide a map with the location of the reported capacity SSOs for the period 2015-2018.

- b. Non-Capacity Related SSOs. For each year, please identify how many SSOs how many were related to construction & vandalism or operation & maintenance (of those, please breakdown the cause (debris, equipment failure, grease, line failure or roots).
3. The 2012 SEACAP Improvement Plan identified two categories of capacity improvements, Priority 1 and Priority 2 projects. The Priority 1 projects list was further defined by the relation to eliminate the reported SSOs as reference in CAO LIS 08-099.
 - a. Please provide a list of the Priority 1 projects that have not been completed.
 - b. For the period 2015-2018, please identify the number of capacity SSOs per year, that are related to these incomplete Priority 1 Projects.
 - c. Please provide a map with the location of the capacity SSOs for the period 2015-2018.
 - d. Please provide a plan and milestone schedule to address any of the Priority 1 Projects that have not been completed.

As we discussed, I will send a separate email with some propose meeting dates beginning in the middle of June.

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

Thanks

Richard C. Healey
Enforcement Branch Manager
Office of Water Quality
Arkansas Department of Environmental Quality
501-682-0640
healey@adeq.state.ar.us