

**Minutes of Enforcement Meeting Between
ADEQ and City of Hot Springs
Tuesday, July 9, 2013, 10:00 – 10:22 A.M.
Permit Number: AR0033880 AFIN: 26-00145**

Present: A. Layher, K. Fuller, R. Healey, C. Uyeda, S. Hill, D. Gerst; Larry Merriman, P.E., Sr. Project Mgr. for H.S.; Ron Wacaster, City of H.S.; Jim Sorrels, City of H.S.; Aaron Stallmann, P.E., Garver Associates

Introductions were made. Mr. Merriman began by explaining that they have an upset condition that they recognized and have been working to fix for a year. Their boiler and associated gas lines went down and had to be replaced. In the meantime, they lost the colony of microorganisms that controlled their ammonia levels. They said they are at the point that they will soon have a permit effluent violation for ammonia. They explained they have been doing everything possible to correct the situation. Mr. Merriman explained that Garver Associates has been assisting with their efforts. He said that the City wanted to come in person to explain the situation discuss their efforts at recovery. During the timeframe of this situation, the City Utility Director also resigned suddenly.

Ms. Layher asked about the project timeline. Mr. Sorrels explained that from the time their boiler went down until they lost the "bugs" was about six months. She went on to ask about this being an anaerobic problem. Mr. Sorrels explained that there was "0" production from wasting, when de-water is going back to the head of the plant and is at 60-80. They have had equipment problems, the boiler is now in place, but they believe it will take up to 6 months to reestablish the microorganisms. Ms. Layher asked if they could buy microorganisms to accelerate the process and was told that currently the sludge needs to warm considerably before they could thrive. Mr. Merriman explained that they are trying to get an anaerobic digester that can warm one side of the sludge, and then the other. At that point, they will decide what additional actions to take to optimize the improvements.

They were asked by Ms. Layher about the limits for Ammonia and what averages were occurring. Mr. Sorrels said Ammonia was "7.5" for a 7-day-limit and "3" for a daily-limit. He also said their Ammonia was 8 - 16 on the average. Ms. Fuller said that since they passed on Ammonia this month, they would probably see problems the next month.

Ms. Fuller confirmed that Hot Springs had completed their permit renewal process. She asked how their phosphorous parameters were doing. Mr. Sorrels said they were not having problems there.

Mr. Merriman asked about getting set up for Net-DMR. He was referred to Amy Schluterman for assistance.

Mr. Sorrels asked if penalties would be imposed on the City for these violations. Ms. Fuller said that fines may be levied, but as a major facility it is essential to stay within guidelines set by EPA. Mr. Uyeda told them that it was certainly to their benefit to have self-reported and provided the information to ADEQ as they have.

Ms. Layher asked them to put all the information regarding the non-compliance, what actions the facility has taken and intends to take in order to bring the facility back into compliance, in a written format. This would be a separate item from the NCR (non-compliance report) sent with the DMRs.

Ms. Layher confirmed that the June DMRs would be the first ones showing violations. She suggested that they may have to go through a voluntary CAO. Mr. Healey suggested that their report should be reviewed by ADEQ before setting another meeting. It was decided that the report would be due July 19, 2013.

The meeting was adjourned at 10:22 A.M.

Respectfully submitted,
Deborah Gerst



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