

## Tanya Ester (adpce.ad)

---

**From:** Terry Liu (adpce.ad)  
**Sent:** Monday, February 24, 2025 9:56 AM  
**To:** Tanya Ester (adpce.ad)  
**Cc:** Colby Ungerank (adpce.ad)  
**Subject:** FW: 20-2111 Cave Springs, AFIN 04-01642

Tanya,

Could you please create an ePortal internal letter template for this request? Please let me know which engineer is assigned to this once it is completed.

---

**From:** Richard Healey (adpce.ad) <Richard.Healey@arkansas.gov>  
**Sent:** Wednesday, February 19, 2025 7:23 AM  
**To:** Shannon Jones <sjones@mce.us.com>  
**Cc:** Leslie Allen-Daniel (adpce.ad) <Leslie.Allen-Daniel@arkansas.gov>; Daniel Barnes <dbarnes@mce.us.com>; Terry Liu (adpce.ad) <Terry.Liu@arkansas.gov>  
**Subject:** RE: 20-2111 Cave Springs, AFIN 04-01642

Shannon:

By copy of this email, I forwarding your request to Terry Liu, Engineering Supervisor in the Office of Water Quality's No-Discharge Permits section on how to close or transfer the STEP system permit.

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@arkansas.gov](mailto:Richard.Healey@arkansas.gov)



**ARKANSAS**  
ENERGY & ENVIRONMENT

---

**From:** Shannon Jones <[sjones@mce.us.com](mailto:sjones@mce.us.com)>  
**Sent:** Wednesday, February 19, 2025 7:06 AM  
**To:** Richard Healey (adpce.ad) <[Richard.Healey@arkansas.gov](mailto:Richard.Healey@arkansas.gov)>  
**Cc:** Leslie Allen-Daniel (adpce.ad) <[Leslie.Allen-Daniel@arkansas.gov](mailto:Leslie.Allen-Daniel@arkansas.gov)>; Daniel Barnes <[dbarnes@mce.us.com](mailto:dbarnes@mce.us.com)>  
**Subject:** 20-2111 Cave Springs, AFIN 04-01642

Some people who received this message don't often get email from [sjones@mce.us.com](mailto:sjones@mce.us.com). [Learn why this is important](#)

Richard,

Good morning. Hopefully you can point me in the right direction if this is not in your wheelhouse.

The City of Cave Springs operates a STEP system and two (2) package wastewater treatment plants and drip irrigation for subsurface discharge. A project is nearing completion that will connect the sewer system to the NACA wastewater treatment facility. As part of the project, we are developing a "closure" plan pursuant to the NPDES permit.

xii. Requirements for a closure plan This condition is required to ensure that the permittee takes all of the necessary means to adequately close this type of system, which includes removal of all the waste from the system and properly filling or collapsing the septic systems.

The STEP system will continue to be utilized along with the new lift station to send all wastewater to NACA.

There is an agreement with the City and the golf course owner to abandon all improvements by the City (wastewater treatment and drip field irrigation) in their present location and become the sole property and responsibility of the golf course owner.

1. Is it possible to transfer ownership of the wastewater treatment units along with the drip field system to the golf course owner?
2. Is it possible for the golf course owner to immediately start using one or both of the wastewater treatment units if an appropriate NPDES permit is acquired? I presume a NPDES permit cannot be transferred.

To that end, the intent is to have all sludge removed (with subsequent pressure washing) from any process tanks, clarifiers, holding tanks, and drip field pump tanks. The drip field tanks will be filled with water to prevent flotation. The system will be turned over to the golf course owner in "mothball status" after disconnecting any utility services. The owner of the golf course does not wish to have the City to remove any equipment or demo any of the process tanks.

Since we will not be filling or collapsing any tanks, we are seeking guidance on closure plan protocols for this unique situation.

Thank you.



**Shannon Jones, P.E.**  
Senior Project Engineer  
W: (479) 443.2377  
C: (479) 387.7223  
1580 E. Stearns Street  
Fayetteville, AR 72703