



**DIVISION OF
ENVIRONMENTAL
QUALITY**

Sarah Huckabee Sanders
GOVERNOR

Shane E. Khoury
SECRETARY

July 11, 2024

Mr. Monty Ledbetter, Utilities Director
City of Hot Springs POTW
320 Davidson Drive
Hot Springs, AR 71902
Email Address: mledbetter@cityhs.net

RE: Hot Springs POTW SSO Inspection- PDS# 130984 (Garland County)
AFIN: 26-00145 Permit No.: AR0033880

Dear Mr. Ledbetter:

On July 2, 2024, I performed a Reconnaissance Inspection of the above referenced facility in accordance with the provisions of the Federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, and the regulations promulgated thereunder. The inspection was conducted in response to a complaint. A copy of the inspection report is enclosed for your records.

Please refer to the “Summary of Findings” section of the inspection report and provide a written response for each item that was noted. This response should be mailed to the attention of the Office of Water Quality Compliance Branch at the address below my signature or emailed to Water-Inspection-Report@adeq.state.ar.us. This response should contain documentation describing the course of action taken to correct each noted item. The corrective action(s) should be completed as soon as possible and the written response with all necessary documentation (i.e. photos) is due by **July 26, 2024**.

If I can be of any assistance, please contact me at travis.harmon@adeq.state.ar.us or (501) 837-2070.

Sincerely,

A handwritten signature in cursive script that reads "Travis Harmon".

Travis Harmon
Inspector, Office of Water Quality

 ENVIRONMENTAL QUALITY		OFFICE OF WATER QUALITY INSPECTION REPORT							
		AFIN: 26-00145		PERMIT #: AR0033880		DATE: 7/2/2024			
		COUNTY: 26 Garland		PDS #: 130984		MEDIA: WN			
		GPS LAT: 34.466132 LONG: -93.043484 LOCATION: N/A							
FACILITY INFORMATION				INSPECTION INFORMATION					
NAME: Hot Springs POTW SSO LOCATION: Near 102 Forest View Ct CITY: Hot Springs, AR				FACILITY TYPE: 1 - Municipal		INSPECTOR ID#: 34689 S - State			
				FACILITY EVALUATION RATING: N		INSPECTION TYPE: Reconnaissance			
				DATE(S): 7/2/2024		ENTRY TIME: 11:00		EXIT TIME: 12:15	
				PERMIT EFFECTIVE DATE: 7/1/2024		PERMIT EXPIRATION DATE: 6/30/2029			
				RESPONSIBLE OFFICIAL					
NAME / TITLE: Mr. Monty Ledbetter / Utilities Director COMPANY: City of Hot Springs POTW MAILING ADDRESS: 320 Davidson Drive CITY, STATE, ZIP: Hot Springs AR 71902 PHONE & EXT. / FAX: 501-262-1125 / EMAIL: mledbetter@cityhs.net				FAYETTEVILLE SHALE RELATED: N					
				FAYETTEVILLE SHALE VIOLATIONS: N					
				INSPECTION PARTICIPANTS					
				NAME/TITLE/PHONE/FAX/EMAIL/ETC.: Mr. Jeff Smith/ Manhole Supervisor					
				CONTACTED DURING INSPECTION: No					
AREA EVALUATIONS (S=Satisfactory, M=Marginal, U=Unsatisfactory, N=Not Applicable/Evaluated)									
N	PERMIT	N	FLOW MEASUREMENT	N	STORMWATER				
N	RECORDS/REPORTS	N	LABORATORY	N	FACILITY SITE REVIEW				
N	OPERATION & MAINTENANCE	N	EFFLUENT/RECEIVING WATER	N	SELF-MONITORING PROGRAM				
N	SAMPLING	N	SLUDGE HANDLING/DISPOSAL	N	PRETREATMENT				
U	OTHER: Potential for SSO at manhole near 102 Forest View Ct								

SUMMARY OF FINDINGS	
1. Potential for SSO's at a manhole located near 102 Forest View Court. The manhole is located near the pedestrian bridge crossing the creek. Manholes in this area are sealed, however, an opening in the side has formed and applicators are visible caught in the hole. A small scour beside the manhole was visible, indicating SSO's at some point prior to the inspection. The ground around the manhole was dry at the time of inspection. Please see photos #3 and #4. Mr. Jeff Smith, Manhole Supervisor, indicated the manhole would be re-sealed.	

GENERAL COMMENTS**Introduction**

The Governor's Office received a complaint (PDS #033061) from Ms. Jerlene McCoig on July 28, 2024. The complaint was forwarded to ADH and Mr. Terry Paul contacted her. The complaint alleges She has an issue with Hot Springs Sewer Utility, the responsible party for her complaints. She called during COVID regarding the same issue. The regrading of a drain and additional activities since then, such as the building of a pedestrian pathway, have led to erosion and other problems on or next to her property. She has been heavily involved with Hot Springs trying to resolve the issue. Hot Springs has been issued consent orders to correct their Sanitary Sewer Overflows (SSO'S). She reports she became ill after working in the ditch with a neighbor, with tennis shoes on, and is convinced she had E coli, but a doctor said it was too much trouble to test.

Reconnaissance Inspection

I arrived at the city facility located on Adam's Street and asked to have a City Employee attend a site inspection at 102 Forest View Court. Mr. Jeff Smith, Manhole Supervisor, accompanied me to the location. I photographed a sealed manhole in the front yard at 1-2 Forest View Court. There was no evidence of recent SSO's at the time of inspection. I photographed a second sealed manhole along the drainage located on the north side of 102 Forest View Court. There was no evidence of recent SSO's at the time of inspection. I then photographed a third sealed manhole located east and closer to the creek. Although the ground around the manhole was dry at the time of inspection, I photographed a hole which had formed in the side of the manhole which had applicators stuck in the hole. The hole appeared to have allowed SSO's at some point prior to the inspection as evidenced by a small scour and an applicator next to the manhole. Mr. Smith indicated the manhole would be re-sealed.

The drainage with rip rap installed, running west to east toward the creek and located just north of 102 Forest View Court, is not part of the trail construction project per a prior conversation with Aaron Graulau, City of Hot Springs MS4. Ms. McCoig has complained previously regarding erosion and drainage concerns. The rip rap was installed to prevent erosion. The drainage is well stabilized and I saw no erosion concerns at the time of inspection. A portion of 102 Forest View Court is located in a flood zone and I informed Ms. McCoig concerns regarding drainage issues on her property are not regulated by ADEQ, currently re-named Arkansas Energy & Environment/ AE&E, and that this would be a civil matter.

The portion of the Greenbelt Trail located east of 102 Forest View Court is constructed and appeared sufficiently stabilized as I saw no erosion concerns at the time of inspection. AE&E has no regulatory authority to address foot traffic using the trail and any potential for trespassing.

INSPECTOR'S SIGNATURE: 	Travis Harmon	DATE: 7/3/2024
SUPERVISOR'S SIGNATURE: 	Amy Huneycutt	DATE: 7/11/2024

Office of Water Quality Photographic Evidence Sheet

Location:	Hot Springs POTW SSO		
Photographer:	Travis Harmon	Date:	July 2, 2024
Time:	1138	Witness:	None- no other regulatory personnel
Photo #:	1	Description:	1 st Manhole in front yard at 102 Forest View Ct. No SSO evidence at time



Photographer:	Travis Harmon	Date:	July 2, 2024
Time:	1139	Witness:	None
Photo #:	2	Description:	2 nd manhole near drainage north of 102 Forest View Ct. No SSO evidence at time.



Office of Water Quality Photographic Evidence Sheet

Location:	Hot Springs POTW SSO		
Photographer:	Travis Harmon	Date:	July 2, 2024
Witness:	None	Time:	1141
		Photo #:	3
Description:	3 rd manhole nearest creek. Applicator, white, on ground to right of manhole.		



Photographer:	Travis Harmon	Date:	July 2, 2024
Witness:	None	Time:	1142
		Photo #:	4
Description:	Hole visible with applicators trapped at the hole. Also a scour formed indicating SSO's at times prior to the inspection.		



Office of Water Quality Photographic Evidence Sheet

Location:	Hot Springs POTW SSO		
Photographer:	Travis Harmon	Date:	July 2, 2024
Witness:	None	Time:	1139
		Photo #:	5
Description:	Rip rap in drainage located north of 102 Forest View Ct.		



Photographer:	Travis Harmon	Date:	July 2, 2024
Witness:	None	Time:	1146
		Photo #:	6
Description:	Rip rap in drainage opposite side of street. Looking west.		



Office of Water Quality Photographic Evidence Sheet

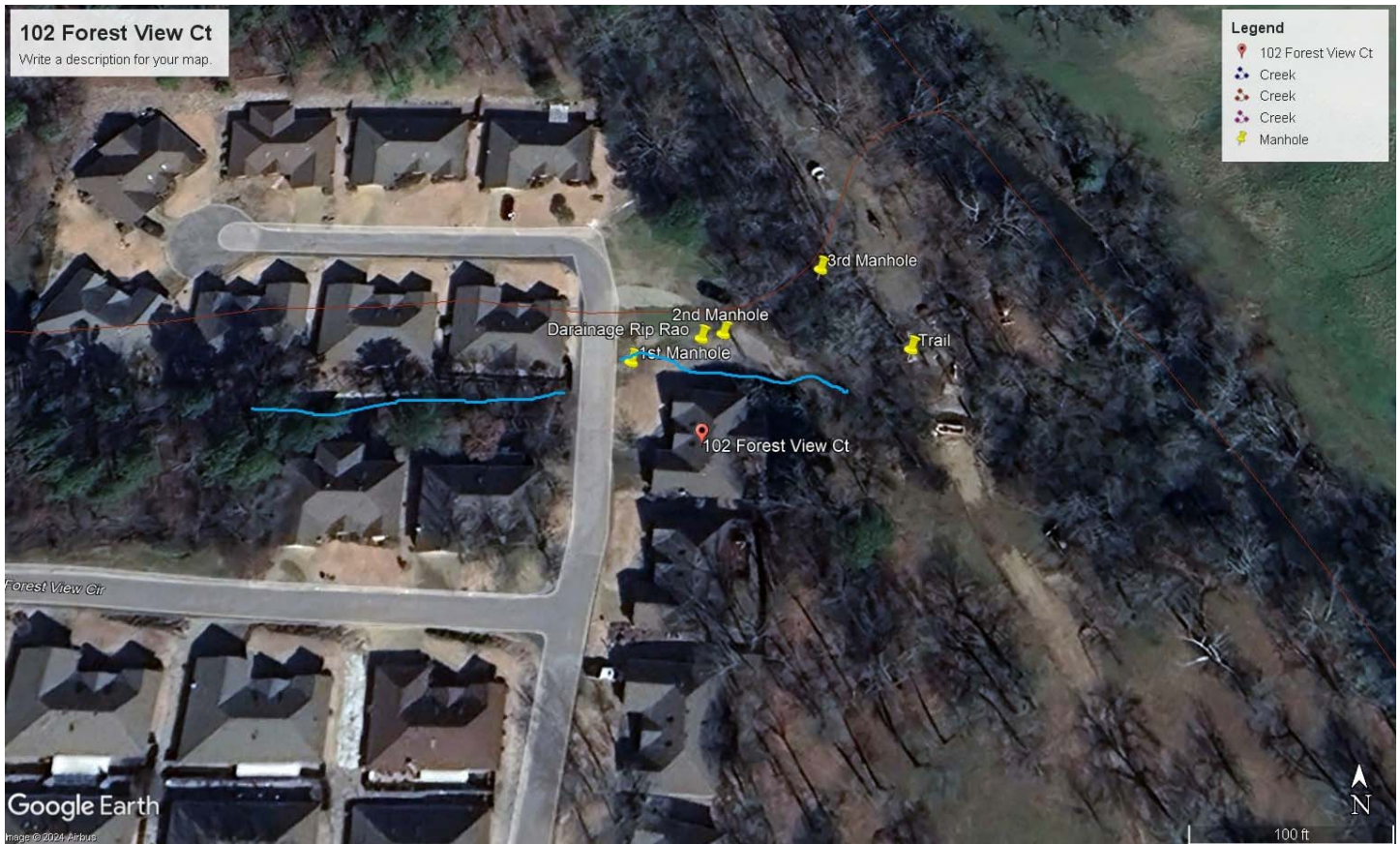
Location:	Hot Springs POTW SSO		
Photographer:	Travis Harmon	Date:	July 2, 2024
Witness:	None	Time:	1140
		Photo #:	7
Description:	Area of Greenbelt Trail near 102 Forest View Ct.		



Photographer:	Travis Harmon	Date:	July 2, 2024
Witness:	None	Time:	1140
		Photo #:	8
Description:	Additional view of pedestrian bridge.		



Google Earth View/ Note red line Waters of the State are slightly off location when overlaid, as the drainage running west to east is located on the south side of the homes opposite 102 Forest View Court and continues east along the north side of 102 Forest View Court. The blue line is an estimated location of the current drainage:





CITY OF HOT SPRINGS

Utilities Department

780 Adams Street

Hot Springs, Arkansas 71901

July 12, 2024

Travis Harmon
Inspector, Office of Water Quality
Arkansas Department of Energy & Environment
5301 Northshore Drive
North Little Rock, Arkansas 72118-5317

RE: Hot Springs POTW SSO Inspection – PDS# 130984 (Garland County)
AFIN: 26-00145
Permit No.: AR0033880
Written Response to Summary of Findings

Dear Mr. Harmon,

Summary of Findings: Item 1

1. Potential for SSO's at a manhole located near 102 Forest View Court. The manhole is located near the pedestrian bridge crossing the creek. Manholes in this area are sealed, however, an opening in the side had formed and applicators are visible caught in the hole. A small scour beside the manhole was visible, indicating SSO's at some point prior to the inspection. The ground around the manhole was dry at the time of inspection.

Response: Action Taken to Repair Issue at Manhole 12242

The frame, cover and Ram-Nek gasket were removed. New Ram-Nek was installed. The frame was reset frame and cover replaced. Six additional anchor bolts were drilled and tapped to make a total of ten anchors to secure the frame. Hydraulic cement was used to grout around the frame. Debris was removed and the scour area backfilled. (Documentation Photos attached)

As your inspection report acknowledges, the drainage and Greenbelt Trail are not under the purview of AE&E/DEQ, nor are they under the authority of Hot Springs Utilities.

Should you have any further questions or concerns, please contact me at (501)651-7730 or by email at mledbetter@cityhs.net.

Sincerely,

Monty Ledbetter
Utilities Director

Attachments: Photographic Documentation of Repair- Manhole 12242

cc: City of Hot Springs – Bobby Harris, Assistant Utilities Director; Shawn Davis, Collection Manager

Hot Springs Creek Basin Manhole 12242

Photographic Documentation of Repair



MH 12242 - Before repair



MH 12242 - Cover removed, during Ram-Nek replacement



MH 12242 - After Ram-Nek replaced



MH 12242 - New anchors installed, cover replaced

Hot Springs Creek Basin Manhole 12242

Photographic Documentation of Repair



MH 12242 – Hydraulic cement seal



MH 12242 – Backfill around manhole



DIVISION OF ENVIRONMENTAL QUALITY

Sarah Huckabee Sanders
GOVERNOR

Shane E. Khoury
SECRETARY

July 24, 2024

Mr. Monty Ledbetter, Utilities Director
City of Hot Springs POTW
320 Davidson Drive
Hot Springs, AR 71902
Email Address: mledbetter@cityhs.net

RE: Adequate Response to City of Hot Springs POTW Inspection- PDS# 130984
AFIN: 26-00145 Permit No.: AR0033880

Dear Mr. Ledbetter:

I have reviewed the response pertaining to my inspection of the manhole located near 102 Forest View Court. The information provided sufficiently addresses the items referenced in my inspection report. At this time, the Division has no further comment concerning this inspection. Acceptance of this response by the Division does not preclude any future enforcement action deemed necessary at this site or any other site.

If I require further information concerning this matter, I will contact you. Thank you for your attention to this matter. Should you have any questions please contact me at (501) 837-2070 or you may email me at travis.harmon@adeq.state.ar.us.

Sincerely,

A handwritten signature in black ink that reads "Travis Harmon".

Travis Harmon
Inspector, Office of Water Quality