



**DIVISION OF
ENVIRONMENTAL
QUALITY**

Sarah Huckabee Sanders
GOVERNOR

Shane E. Khoury
SECRETARY

March 4, 2025

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

RE: City Hot Springs POTW Inspection (Garland County) – PDS# 133095
AFIN: 26-00145 Permit No.: AR0033880

Dear Mr. Ledbetter:

On February 27, 2025, 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. A copy of the inspection report is enclosed for your records.

Please refer to the “Summary of Findings” section of the attached inspection report and provide a written response for each violation that was noted. This case has been referred directly to the Office of Water Quality - Enforcement Branch for further review. The City of Hot Springs should immediately initiate all actions necessary to resolve and correct the alleged violations cited in the inspection report. Written notification of the corrective actions taken for the alleged violations must be submitted within thirty (30) calendar days from receipt of this letter to the attention of Richard Healey, Office of Water Quality Enforcement Branch Manager, at (501) 682-0640 or ee.water.enforcement.report@arkansas.gov. This written notification should include but not limited to, photographs and/or copies of other documentation.

If I can be of any assistance, please contact me at travis.harmon@arkansas.gov 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: 2/27/2025
	COUNTY: 26 Garland		PDS #: 133095		MEDIA: WN
	GPS LAT: 34.465941 LONG: -93.044170 LOCATION: General Area				
FACILITY INFORMATION			INSPECTION INFORMATION		
NAME: City Hot Springs POTW LOCATION: 320 Davidson Drive CITY: Hot Springs, AR 71902			FACILITY TYPE: 1 - Municipal INSPECTOR ID#: 34689 S - State		
			FACILITY EVALUATION RATING: N INSPECTION TYPE: Reconnaissance		
			DATE(S): 2/27/2025 ENTRY TIME: 11:00 EXIT TIME: 12:30		
			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: *** FAYETTEVILLE SHALE VIOLATIONS: ***		
CONTACTED DURING INSPECTION: No			INSPECTION PARTICIPANTS NAME/TITLE/PHONE/FAX/EMAIL/ETC.: N/A		
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: SSO at 107 Forrest View Ct				
SUMMARY OF FINDINGS					
1. I photographed evidence of a recent SSO at a manhole behind 107 Forrest View Court which is prohibited in Part II.5 of the permit.					

GENERAL COMMENTS

Introduction

I inspected February 27, 2025, in response to a referral from Representative Cozark, which had been referred to Colbie Jones, ADE&E Associate Environmental Coordinator, from Ms. Jerlene McCoig at 102 Forrest View Court. Ms. McCoig reports large runoff across her property that the odor from the runoff has made her nauseous.

Reconnaissance Inspection

I met with Ms. McCoig and listened to her concerns. I first inspected the manhole in her front yard, a manhole along the side of her home, and a manhole near Hot Spring Creek. I did not see evidence of SSO's at these three manholes. While speaking with Ms. McCoig she mentioned an SSO coming from upstream in the drainage ditch which flows beside her home. I walked the rip rap upstream to a manhole located behind 107 Forrest View Court where I photographed evidence of a recent SSO. The manhole lid was not sitting flush on the manhole and tissue was present on the rip rap. I informed Ms. McCoig that I would notify the sewer plant. I called the Davidson WWTP that day and reported the SSO. I emailed Mr. Monty Ledbetter, Utilities Director, on February 28, 2025 concerning the SSO. Mr. Ledbetter responded via email that the SSO would be cleaned that day and further reported on March 3, 2025 that the SSO had been cleaned. Mr. Ledbetter's email is attached.

INSPECTOR'S SIGNATURE: 	Travis Harmon	DATE: 3/3/2025
SUPERVISOR'S SIGNATURE: 	Amy Huneycutt	DATE: 3/4/2025

Office of Water Quality Photographic Evidence Sheet

Location:	City Hot Springs POTW		
Photographer:	Travis Harmon	Date:	February 27, 2025
Time:	1217	Witness:	None
Photo #:	1	Description:	View of manhole with evidence of recent SSO.



Photographer:	Travis Harmon	Date:	February 27, 2025
Time:	117	Witness:	None
Photo #:	2	Description:	Additional view of tissue left from SSO on the rip rap of the drainage ditch.





From: Monty Ledbetter <MLedbetter@cityhs.net>
Sent: Monday, March 3, 2025 10:19 AM
To: Travis Harmon (adpce.ad); Richard Healey (adpce.ad)
Cc: Jason Bolenbaugh (adpce.ad); Amy Huneycutt (adpce.ad)
Subject: Re: 102 Forrest View Ct
Attachments: CHS - 107 Forest View Ct MH #3827 Clean up .zip

You don't often get email from ml Ledbetter@cityhs.net. [Learn why this is important](#)

This has been cleaned up and limed.



This email, including any attachment(s) to it, is confidential and intended solely for the use of the individual or entity to which it is addressed. If you have received this email in error, please notify the sender immediately. The City of Hot Springs does not accept liability for any damage caused by any virus transmitted by this email. The recipient should check this email and any attachments for the presence of viruses.

transmitted by this email. The recipient should check this email and any attachments for the presence of viruses.

From: Travis Harmon (adpce.ad) <Travis.Harmon@arkansas.gov>
Sent: Friday, February 28, 2025 9:17 AM
To: Richard Healey (adpce.ad) <Richard.Healey@adeq.state.ar.us>
Cc: Jason Bolenbaugh (adpce.ad) <Jason.Bolenbaugh@arkansas.gov>; Amy Huneycutt (adpce.ad) <Amy.Huneycutt@arkansas.gov>; Monty Ledbetter <MLedbetter@cityhs.net>
Subject: 102 Forrest View Ct

EXTERNAL SENDER. DO NOT click links, or open attachments, if sender is unknown, or the message seems suspicious in any way. DO NOT provide your user ID or password!

Richard,

I investigated a complaint at 102 Forrest View Ct yesterday, and found evidence of SSO's at a manhole behind

107 Forrest View Ct. The SSO wasn't on-going, but there was tissue on the rip rap of the drainage just upstream of 102 Forrest View Ct. In the attached image, the manhole lid doesn't sit flush and has a gap. I will complete a PDS Recon report with referral to Enforcement as it concerns SSO's. I called the WWTP plant yesterday and notified and have included Mr. Ledbetter on this email.

Thank You,
Travis Harmon





From: Monty Ledbetter <MLedbetter@cityhs.net>
Sent: Wednesday, March 5, 2025 1:21 PM
To: Uniqika Marshall (adpce.ad); Richard Healey (adpce.ad)
Cc: Travis Harmon (adpce.ad); Bill Burrough; Denny McPhate; Bobby Harris; Shawn Davis; Howard Hoover; Amy Huneycutt (adpce.ad); EE Water Enforcement Report; Harold Mauldin
Subject: Re: City Hot Springs POTW Inspection (Garland County) – PDS# 133095
Attachments: img03052025_0001.pdf

Attached is the city of Hot Springs response to Feb 27th inspection at 107 Forest View Court. If you have any questions, please call or email me.

Thanks



This email, including any attachment(s) to it, is confidential and intended solely for the use of the individual or entity to which it is addressed. If you have received this email in error, please notify the sender immediately. The City of Hot Springs does not accept liability for any damage caused by any virus transmitted by this email. The recipient should check this email and any attachments for the presence of viruses transmitted by this email. The recipient should check this email and any attachments for the presence of viruses.

From: Uniqika Marshall (adpce.ad) <Uniqika.Marshall@arkansas.gov>
Sent: Tuesday, March 4, 2025 3:23 PM
To: Monty Ledbetter <mledbetter@cityhs.net>
Cc: Travis Harmon (adpce.ad) <Travis.Harmon@arkansas.gov>; Amy Huneycutt (adpce.ad) <Amy.Huneycutt@arkansas.gov>; EE Water Enforcement Report <EE.Water.Enforcement.Report@arkansas.gov>
Subject: City Hot Springs POTW Inspection (Garland County) – PDS# 133095

EXTERNAL SENDER. DO NOT click links, or open attachments, if sender is unknown, or the message seems suspicious in any way. DO NOT provide your user ID or password!

Mr. Ledbetter,

The Office of Water Quality is sending the attached correspondence to you via email only. If you would like a physical copy, please reply to this email. A copy of the correspondence will be sent to the address on file. Please send your Inspection response to Water-Inspection-Report@adeq.state.ar.us

Thank you,

Uniqika Marshall | Administrative Analyst

Division of Environmental Quality | Office of Water Quality | Permits Branch

5301 Northshore Drive | North Little Rock, AR 72118

t: 501.682.0972 | e: Uniqika.Marshall@adeq.state.ar.us



ARKANSAS
ENERGY & ENVIRONMENT



CITY OF HOT SPRINGS

Utilities Department

780 Adams Street

Hot Springs, Arkansas 71901

March 5, 2025

Mr. Richard Healey, Enforcement Branch Manager
Office of Water Quality
Arkansas Department of Energy and Environment
5301 Northshore Drive
North Little Rock, Arkansas 72118

VIA EMAIL

RE: Hot Springs – Response to Inspection – PDS # 133095 (Garland County)
AFIN: 26-00145 | NPDES Permit No.: AR0033880

Dear Mr. Healey,

In response to your March 4, 2025 letter regarding the February 12, 2025 SSO at Manhole 3718 located behind 107 Forest View Court, we offer the following response:

The overflow was not reported to Hot Springs Utilities until Mr. Harmon informed us on February 27, 2025 after his inspection. On February 27, 2025, a Wastewater Collection crew was dispatched to the site to hydro-clean, remove debris, disinfect and lime the area around Manhole 3718. Going forward, Hot Springs Utilities will monitor this manhole for SSO events. It should be noted that Hot Springs Utilities has a 24/7 emergency call center available to the public for reporting such events.

Post clean-up photos are attached.

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

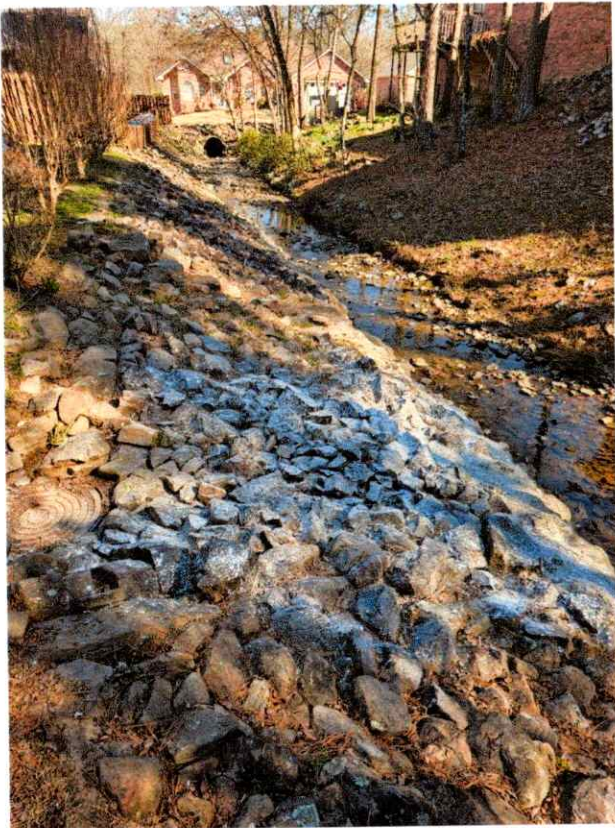
Kindest Regards,

Monty Ledbetter
Utilities Director

cc: **City of Hot Springs** - Bill Burrough, City Manager; Denny McPhate, Deputy City Manager; Bobby Harris, Assistant Utilities Director; Shawn Davis, Collections Manager
ADE&E/ Office of Water Quality – Travis Harmon, Inspector



*Post Clean-up Photos – MH 3718
February 27, 2025*





Monty Ledbetter

Utilities Director

Hot Springs Utilities Department



780 Adams Street
Hot Springs, Arkansas 71901
(501)651-7730