DIVISION OF ENVIRONMENTAL QUALITY

Sarah Huckabee Sanders
GOVERNOR
Shane E. Khoury
SECRETARY

June 18, 2025

Monty Ledbetter, Utilities Director
City of Hot Springs- Davidson WWTP
320 Davidson Drive
Hot Springs, AR 71901
Email: mledbetter@cityhs.net

RE: Hot Springs- Davidson WWTP Inspection (Garland County) – PDS# 133392, 133393
AFIN: 26-00145 Permit No.: AR0033880

Dear Mr. Ledbetter:

On April 30, 2025, I performed a Compliance Evaluation Inspection and Collection System 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 each 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 item noted. 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 3, 2025**.

If I can be of any assistance, please contact me at travis.harmon@arkansas.gov or (501) 837-2070.

Sincerely,

Travis Harmon

Travis Harmon
Inspector, Office of Water Quality

CC via email: hmauldin@cityhs.net gyates@cityhs.net

ENVIRONMENTAL QUALITY

OFFICE OF WATER QUALITY INSPECTION REPORT

AFIN: **26-00145**	PERMIT #: **AR0033880**	DATE: **4/30/2025**
COUNTY: **26 Garland**	PDS #: **133392**	MEDIA: **WN**
GPS LAT: **34.450316** LONG: **-93.19033** LOCATION: **General Area**		

FACILITY INFORMATION

NAME:
Hot Springs- Davidson WWTP
LOCATION:
320 Davidson Drive
CITY:
Hot Springs, AR 71901

RESPONSIBLE OFFICIAL

NAME: / TITLE
Monty Ledbetter / Utilities Director
COMPANY:
City of Hot Springs- Davidson WWTP
MAILING ADDRESS:
320 Davidson Drive
CITY, STATE, ZIP:
Hot Springs AR 71901
PHONE & EXT: / FAX:
501-262-1125 /
EMAIL:
mledbetter@cityhs.net

CONTACTED DURING INSPECTION: **No**

INSPECTION INFORMATION

FACILITY TYPE: **1 - Municipal**
INSPECTOR ID#: **34689 S - State**
FACILITY EVALUATION RATING: **N**
INSPECTION TYPE: **Compliance Evaluation**
DATE(S): **4/30/2025**
ENTRY TIME: **10:00**
EXIT TIME: **14:00**
PERMIT EFFECTIVE DATE: **7/1/2024**
PERMIT EXPIRATION DATE: **6/30/2029**

FAYETTEVILLE SHALE RELATED: **N**

FAYETTEVILLE SHALE VIOLATIONS: **N**

INSPECTION PARTICIPANTS

NAME/TITLE/PHONE/FAX/EMAIL/ETC.:
Gordon Yates/ Operator

AREA EVALUATIONS

(S=Satisfactory, M=Marginal, U=Unsatisfactory, N=Not Applicable/Evaluated)

S	PERMIT	**S**	FLOW MEASUREMENT	**N**	STORMWATER
S	RECORDS/REPORTS	**N**	LABORATORY	**N**	FACILITY SITE REVIEW
M	OPERATION & MAINTENANCE	**S**	EFFLUENT/RECEIVING WATER	**N**	SELF-MONITORING PROGRAM
S	SAMPLING	**S**	SLUDGE HANDLING/DISPOSAL	**N**	PRETREATMENT
N	OTHER:				

SUMMARY OF FINDINGS

1. **The facility should contact the contract lab and update Biomonitoring dilution series to 17,23,31,41, and 55% per Part II.10 of the permit. The March 2025 test used 24, 33, 44, 58, and 77%.**

GENERAL COMMENTS

Introduction

I inspected the facility on April 30, 2025. The inspection was scheduled and Mr. Gordon Yates, Operator, represented the facility. The WWTP is overloaded and is in the process of being modified to increase treatment capacity, with three active construction modification permits.

WWTP Inspection

I inspected the WWTP from influent to final effluent. The photos are shown in order of the treatment process. The WWTP consists of two influent bar screens and two grit chambers, one of which was offline for maintenance during low influent conditions. Then five secondary clarifiers, one under construction, and three aeration basins, which were also being modified at the time of inspection. Two drum filters followed by cascade aeration and then UV disinfection prior to final discharge. There was significant construction activity at the time of inspection and the units that were in operation appeared to be maintained and properly operating. I viewed the final effluent in the composite sample bottle and also at the flume. The final effluent appeared sufficiently treated at the time of inspection.

Records Review

I reviewed monthly and quarterly DMR from March 2024 through February 2025. The facility reported exceedances: March 2024- 3 TSS, 1 NH3-N, 1 TP, 2 FCB, 3 CBOD; May 2024- 1 TSS, 2 FCB;, June 2024- 1 FCB; August 2024- 1 TP; January 2024- 2 TSS, 2 CBOD; February 2025- 2 TSS, 1 FCB, 3 CBOD. These exceedances were reported in NetDMR with non-compliance reports submitted. I also reviewed the February 2025 sample results spreadsheet for DMR calculation accuracy and the March Biomonitoring reports for proper organisms, durations, and dilution series. The facility needs to have the contract lab update dilution series.

INSPECTOR'S SIGNATURE: Travis Harmon	**Travis Harmon**	DATE: **5/30/2025**
SUPERVISOR'S SIGNATURE: Amy Huneycutt	**Amy Huneycutt**	DATE: **6/4/2025**

SECTION A: PERMIT VERIFICATION	
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS	☑S ☐M ☐U ☐NA ☐NE
DETAILS:	
1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE:	☑Y ☐N ☐NA ☐NE
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES:	☐Y ☐N ☑NA ☐NE
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT:	☑Y ☐N ☐NA ☐NE
4. ALL DISCHARGES ARE PERMITTED:	☑Y ☐N ☐NA ☐NE
SECTION B: RECORDKEEPING AND REPORTING EVALUATION	
RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT	☑S ☐M ☐U ☐NA ☐NE
DETAILS: **Lab records request left with the facility**	
1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS:	☑Y ☐N ☐NA ☐NE
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE:	☐S ☐M ☐U ☐NA ☑NE
a. DATES AND TIME(S) OF SAMPLING:	☐Y ☐N ☐NA ☑NE
b. EXACT LOCATION(S) OF SAMPLING:	☐Y ☐N ☐NA ☑NE
c. NAME OF INDIVIDUAL PERFORMING SAMPLING:	☐Y ☐N ☐NA ☑NE
d. ANALYTICAL METHODS AND TECHNIQUES:	☐Y ☐N ☐NA ☑NE
e. RESULTS OF CALIBRATIONS:	☐Y ☐N ☐NA ☑NE
f. RESULTS OF ANALYSES:	☐Y ☐N ☐NA ☑NE
g. DATES AND TIMES OF ANALYSES:	☐Y ☐N ☐NA ☑NE
h. NAME OF PERSON(S) PERFORMING ANALYSES:	☐Y ☐N ☐NA ☑NE
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE:	☐S ☐M ☐U ☐NA ☑NE
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR:	☐S ☐M ☐U ☐NA ☑NE
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA:	☑Y ☐N ☐NA ☐NE
SECTION C: OPERATIONS AND MAINTENANCE	
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED	☐S ☑M ☐U ☐NA ☐NE
DETAILS: **Plant is overloaded and being modified at time of inspection. 3 active construction modification permits.**	
1. TREATMENT UNITS PROPERLY OPERATED:	☑S ☐M ☐U ☐NA ☐NE
2. TREATMENT UNITS PROPERLY MAINTAINED:	☑S ☐M ☐U ☐NA ☐NE
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED:	☑S ☐M ☐U ☐NA ☐NE
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE:	☑S ☐M ☐U ☐NA ☐NE
5. ALL NEEDED TREATMENT UNITS IN SERVICE:	☑S ☐M ☐U ☐NA ☐NE
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED:	☑S ☐M ☐U ☐NA ☐NE
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED:	☑S ☐M ☐U ☐NA ☐NE
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE:	☑Y ☐N ☐NA ☐NE
9. STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED:	☑Y ☐N ☐NA ☐NE
10. PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED:	☑Y ☐N ☐NA ☐NE
11. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR:	☑Y ☐N ☐NA ☐NE
12. IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED: **9 reported in database 3/1/2024-2/28/2025**	☑Y ☐N ☐NA ☐NE
13. HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS: **Construction modification**	☑Y ☐N ☐NA ☐NE
14. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT:	☑Y ☐N ☐NA ☐NE
15. IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT:	☑Y ☐N ☐NA ☐NE

SECTION D: SAMPLING	
PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS	☑S ☐M ☐U ☐NA ☐NE
DETAILS:	
1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT:	☑Y ☐N ☐NA ☐NE
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES:	☑Y ☐N ☐NA ☐NE
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT:	☑Y ☐N ☐NA ☐NE
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT:	☑Y ☐N ☐NA ☐NE
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT:	☐Y ☐N ☐NA ☑NE
6. SAMPLE COLLECTION PROCEDURES ADEQUATE:	☑Y ☐N ☐NA ☐NE
a. SAMPLES REFRIGERATED DURING COMPOSITING:	☑Y ☐N ☐NA ☐NE
b. PROPER PRESERVATION TECHNIQUES USED:	☐Y ☐N ☐NA ☑NE
c. CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136:	☐Y ☐N ☐NA ☑NE
7. IF MONITORING IS PERFORMED MORE OFTEN THAN REQUIRED ARE RESULTS REPORTED ON THE DMR:	☐Y ☐N ☑NA ☐NE

SECTION E: FLOW MEASUREMENT	
PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS	☑S ☐M ☐U ☐NA ☐NE
DETAILS:	
1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED:__ TYPE OF DEVICE: **4 ft. Parshall**	☑Y ☐N ☐NA ☐NE
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED:	☑Y ☐N ☐NA ☐NE
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED:	☑Y ☐N ☐NA ☐NE
4. CALIBRATION FREQUENCY ADEQUATE: **Calibrated 4/26/2024**	☑Y ☐N ☐NA ☐NE
5. RECORDS MAINTAINED OF CALIBRATION PROCEDURES:	☑Y ☐N ☐NA ☐NE
6. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE:	☑Y ☐N ☐NA ☐NE
7. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE:	☑Y ☐N ☐NA ☐NE
8. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES:	☑Y ☐N ☐NA ☐NE
9. HEAD MEASURED AT PROPER LOCATION:	☑Y ☐N ☐NA ☐NE

SECTION F: LABORATORY	
PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS	☐S ☐M ☐U ☐NA ☑NE
DETAILS: **Lab records request left with facility to submit to headquarters**	
1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(B) FOR SLUDGES) :	☐Y ☐N ☐NA ☑NE
2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED:	☐Y ☐N ☐NA ☑NE
3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT:	☐Y ☐N ☐NA ☑NE
4. QUALITY CONTROL PROCEDURES ADEQUATE:	☐Y ☐N ☐NA ☑NE
5. DUPLICATE SAMPLES ARE ANALYZED ≥10% OF THE TIME:	☐Y ☐N ☐NA ☑NE
6. SPIKED SAMPLES ARE ANALYZED ≥10% OF THE TIME:	☐Y ☐N ☐NA ☑NE
7. COMMERCIAL LABORATORY USED:	☐Y ☐N ☐NA ☑NE
a. LAB NAME:	
b. LAB ADDRESS:	
c. PARAMETERS PERFORMED:	
8. BIOMONITORING PROCEDURES ADEQUATE:	☑Y ☐N ☐NA ☐NE
a. PROPER ORGANISMS USED:	☑Y ☐N ☐NA ☐NE
b. PROPER DILUTION SERIES FOLLOWED: **used 24,33,44,58,77 and need 17,23,31,41,55**	☐Y ☑N ☐NA ☐NE
c. PROPER TEST METHODS AND DURATION:	☑Y ☐N ☐NA ☐NE
d. RETESTS AND/OR TRE PERFORMED AS REQUIRED:	☐Y ☐N ☑NA ☐NE

SECTION G: EFFLUENT/RECEIVING WATERS OBSERVATIONS

BASED ON VISUAL OBSERVATIONS ONLY — ☑S ☐M ☐U ☐NA ☐NE

DETAILS: **Viewed in composite sample container**

OUTFALL #:	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	COLOR	OTHER
001	None	None	Clear	none	none	clear	--

SECTION H: SLUDGE DISPOSAL

SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS — ☑S ☐M ☐U ☐NA ☐NE

DETAILS: **Sludge press and then composted at city compost facility**

1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY: ☑S ☐M ☐U ☐NA ☐NE
2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503: ☐S ☐M ☐U ☐NA ☑NE
3. FOR LAND APPLIED SLUDGE, TYPE OF LAND APPLIED TO: (E.G., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE):

SECTION I: SAMPLING INSPECTION PROCEDURES

SAMPLE RESULTS WITHIN PERMIT REQUIREMENTS — ☐S ☐M ☐U ☑NA ☐NE

DETAILS:

1. SAMPLES OBTAINED THIS INSPECTION: ☐Y ☐N ☑NA ☐NE
2. TYPE OF SAMPLE: ☐GRAB:__ ☐COMPOSITE:__ METHOD:__ FREQUENCY:
3. SAMPLES PRESERVED: ☐Y ☐N ☑NA ☐NE
4. FLOW PROPORTIONED SAMPLES OBTAINED: ☐Y ☐N ☑NA ☐NE
5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE: ☐Y ☐N ☑NA ☐NE
6. SAMPLE REPRESENTATIVE OF VOLUME AND NATURE OF DISCHARGE: ☐Y ☐N ☑NA ☐NE
7. SAMPLE SPLIT WITH PERMITTEE: ☐Y ☐N ☑NA ☐NE
8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED: ☐Y ☐N ☑NA ☐NE
9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT: ☐Y ☐N ☑NA ☐NE

SECTION J: STORM WATER POLLUTION PREVENTION PLAN

STORM WATER MANAGEMENT MEETS PERMIT REQUIREMENTS — ☐S ☐M ☐U ☐NA ☑NE

DETAILS:

1. SWPPP UPDATED AS NEEDED:__ DATE OF LAST UPDATE: ☐Y ☐N ☐NA ☑NE
2. SITE MAP INCLUDING ALL DISCHARGES AND SURFACE WATERS: ☐Y ☐N ☐NA ☑NE
3. POLLUTION PREVENTION TEAM IDENTIFIED: ☐Y ☐N ☐NA ☑NE
4. POLLUTION PREVENTION TEAM PROPERLY TRAINED: ☐Y ☐N ☐NA ☑NE
5. LIST OF POTENTIAL POLLUTANT SOURCES: ☐Y ☐N ☐NA ☑NE
6. LIST OF POTENTIAL SOURCES AND PAST SPILLS AND LEAKS: ☐Y ☐N ☐NA ☑NE
7. ALL NON-STORM WATER DISCHARGES ARE AUTHORIZED: ☐Y ☐N ☐NA ☑NE
8. LIST OF STRUCTURAL BMPS: ☐Y ☐N ☐NA ☑NE
9. LIST OF NON-STRUCTURAL BMPS: ☐Y ☐N ☐NA ☑NE
10. BMPS PROPERLY OPERATED AND MAINTAINED: ☐Y ☐N ☐NA ☑NE
11. INSPECTIONS CONDUCTED AS REQUIRED: ☐Y ☐N ☐NA ☑NE

DMR Calculation Check

Reporting Period:	**From**	**2025**	**02**	**01**	**To**	**2025**	**02**	**28**
		Year	**Month**	**Day**		**Year**	**Month**	**Day**

Parameter Checked: **TSS**

	Loading	**Concentration**	
	Mass	**Monthly**	
	Mo. Avg. - lbs/day	**Mo. Avg. - mg/l**	**7-day Avg. - mg/l**
Reported Value:	**2,526.0**	**14.7**	**27.6**
Calculated Value:	**2,526**	**14.69**	**27.63**
Permit Value:	**1,501.2**	**15.0**	**22.5**

If calculated value does not equal reported value, explain:

DMR Calculation Check

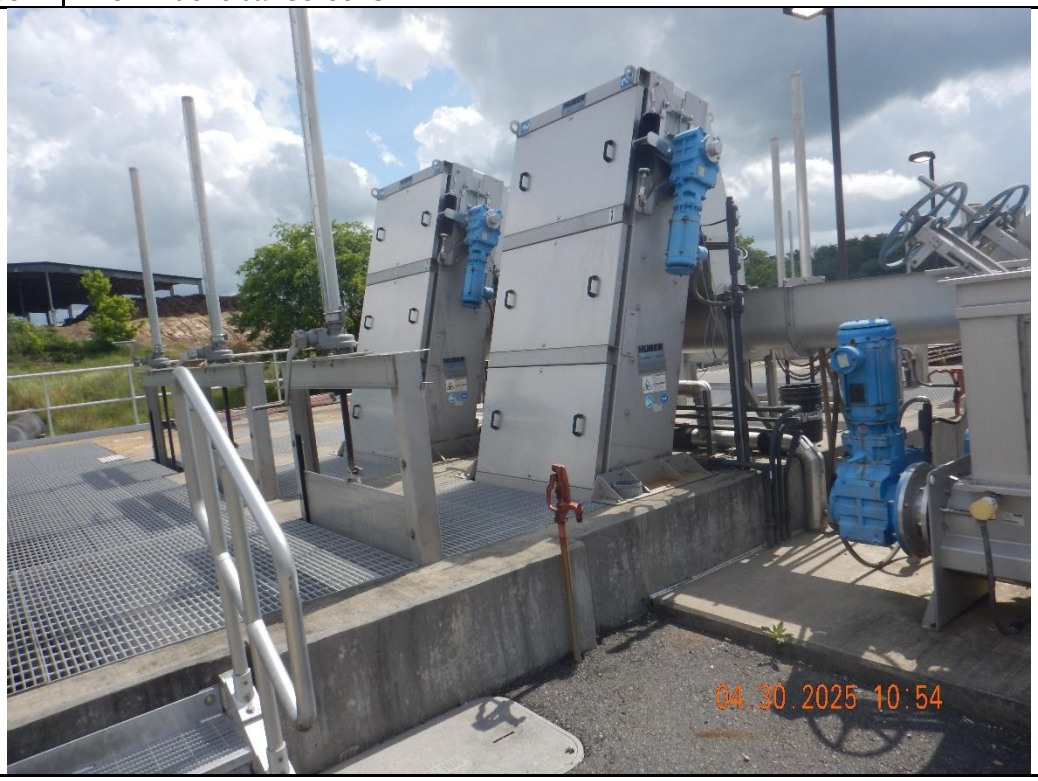
Reporting Period:	**From**	**2025**	**02**	**01**	**To**	**2025**	**02**	**28**
		Year	**Month**	**Day**		**Year**	**Month**	**Day**

Parameter Checked: **CBOD**

	Loading	**Concentration**	
	Mass	**Monthly**	
	Mo. Avg. - lbs/day	**Mo. Avg. - mg/l**	**7-day Avg. - mg/l**
Reported Value:	**2,172.19**	**12.33**	**20.51**
Calculated Value:	**2,172**	**12.3**	**20.51**
Permit Value:			

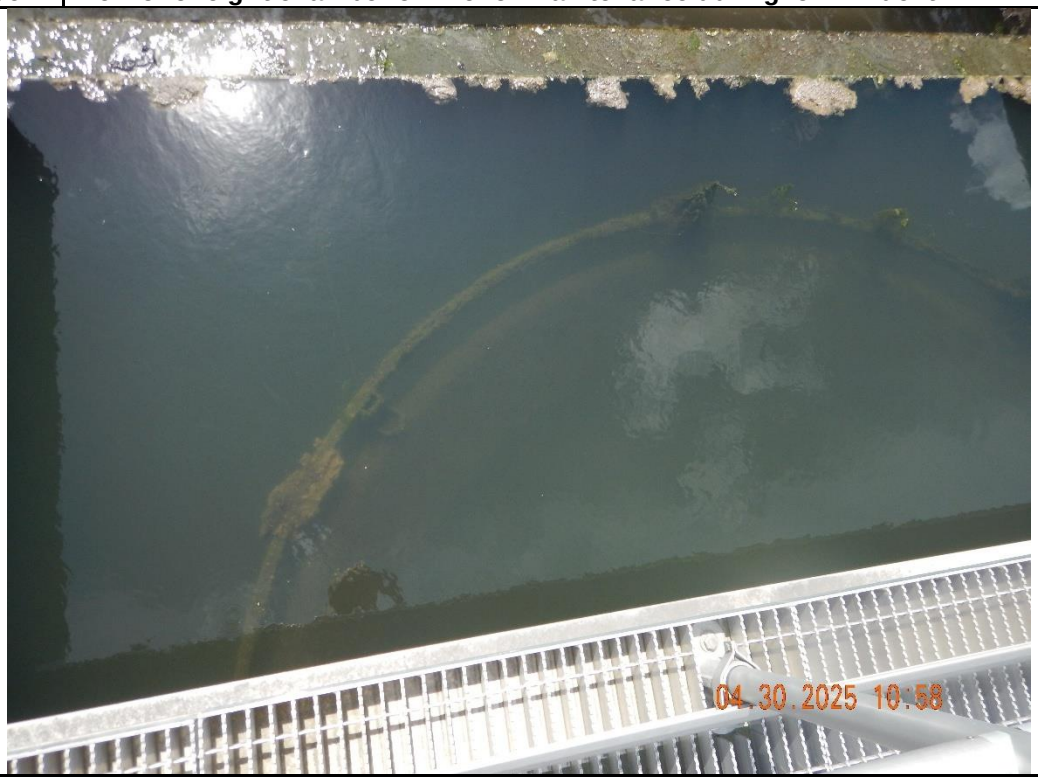
If calculated value does not equal reported value, explain:

Office of Water Quality Photographic Evidence Sheet					
Location:	**Hot Springs- Davidson WWTP**				
Photographer:	**Travis Harmon**	Date:	**April 30, 2025**	Time:	**1054**
Witness:	**None- no other regulatory personnel**			Photo #:	**1**
Description:	**Two influent bar screens**				

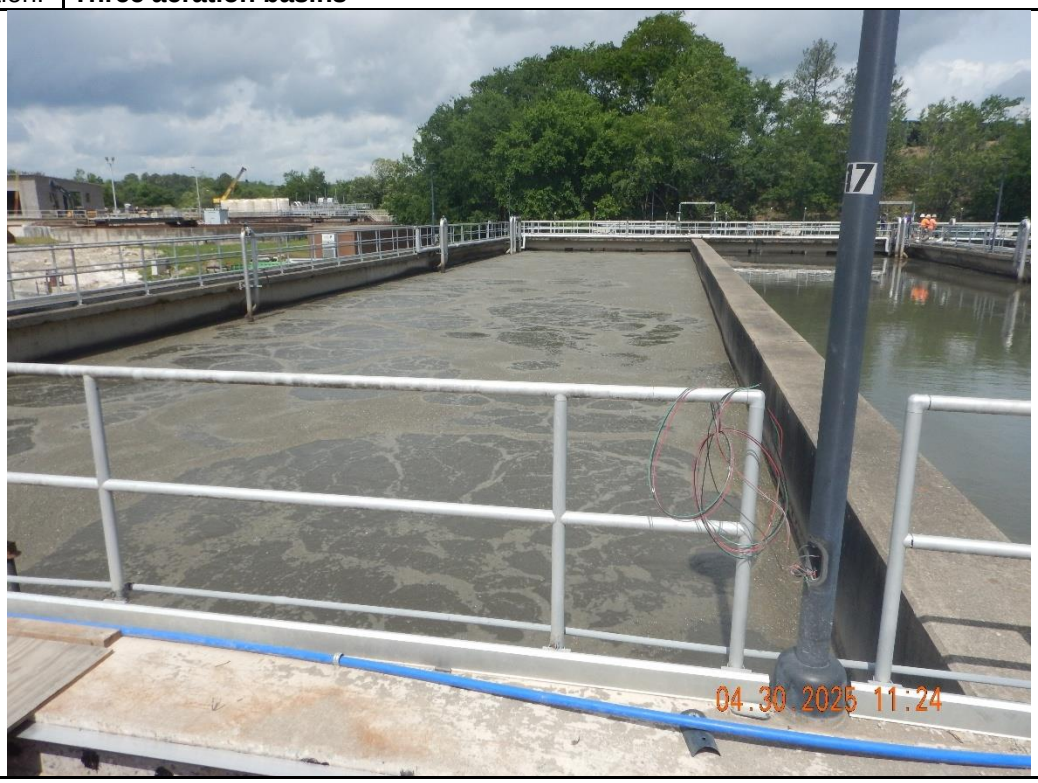


Photographer:	**Travis Harmon**	Date:	**April 30,2025**	Time:	**1057**
Witness:	**None**			Photo #:	**2**
Description:	**Two grit chambers**				

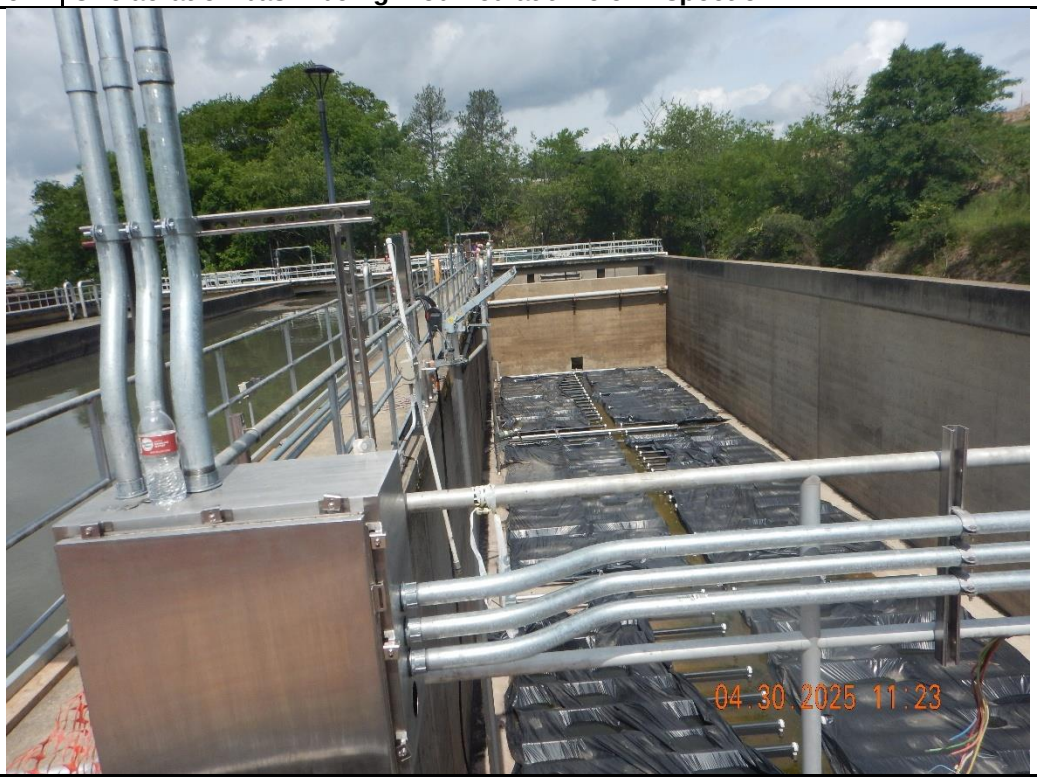
Office of Water Quality Photographic Evidence Sheet					
Location:	**Hot Springs- Davidson WWTP**				
Photographer:	**Travis Harmon**	Date:	**April 30, 2025**	Time:	**1058**
Witness:	**None**			Photo #:	**3**
Description:	**View of one grit chamber offline for maintenance during low influent**				



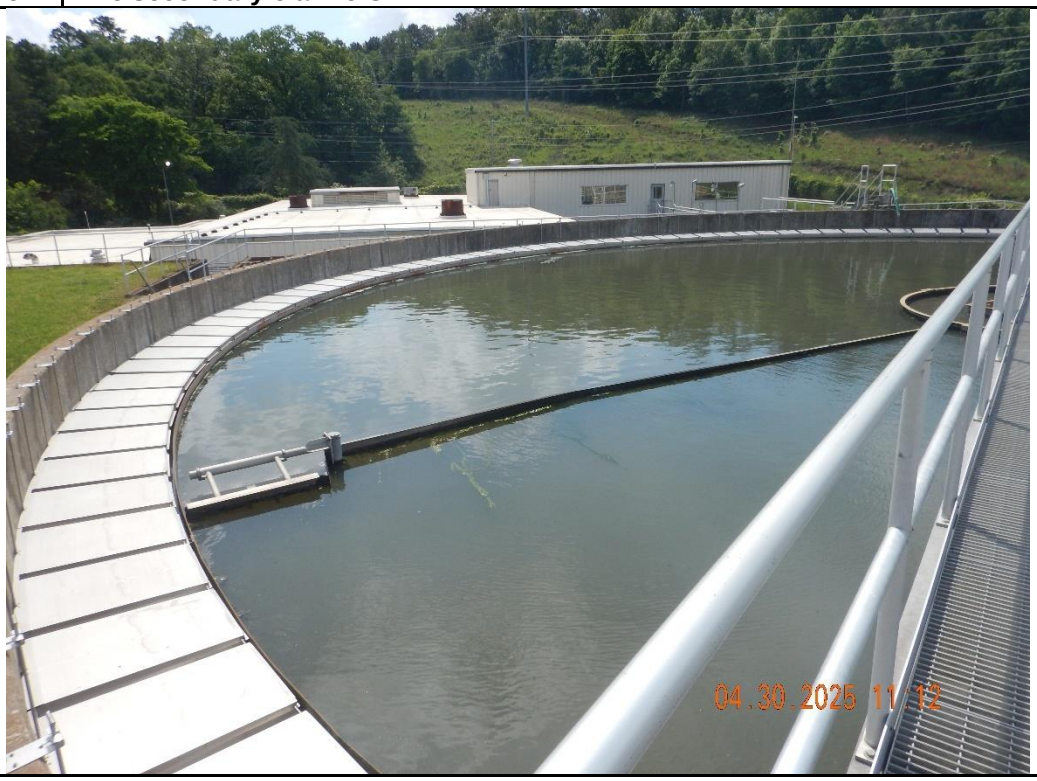
Photographer:	**Travis Harmon**	Date:	**April 30, 2025**	Time:	**1124**
Witness:	**None**			Photo #:	**4**
Description:	**Three aeration basins**				



Office of Water Quality Photographic Evidence Sheet					
Location:	**Hot Springs- Davidson WWTP**				
Photographer:	**Travis Harmon**	Date:	**April 30, 2025**	Time:	**1123**
Witness:	**None**			Photo #:	**5**
Description:	**One aeration basin being modified at time of inspection**				



Photographer:	**Travis Harmon**	Date:	**April 30, 2025**	Time:	**1112**
Witness:	**None**			Photo #:	**6**
Description:	**Five secondary clarifiers**				

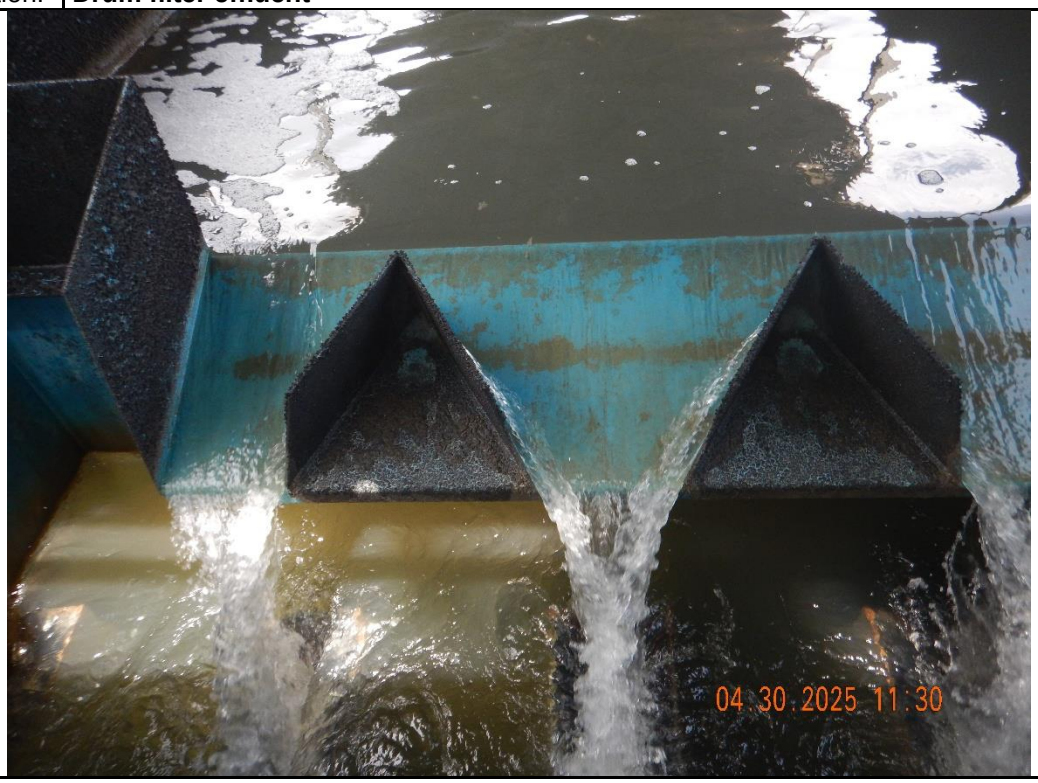


Office of Water Quality Photographic Evidence Sheet					
Location:	**Hot Springs- Davidson WWTP**				
Photographer:	**Travis Harmon**	Date:	**April 30, 2025**	Time:	**1109**
Witness:	**None**			Photo #:	**7**
Description:	**New secondary clarifier under construction**				

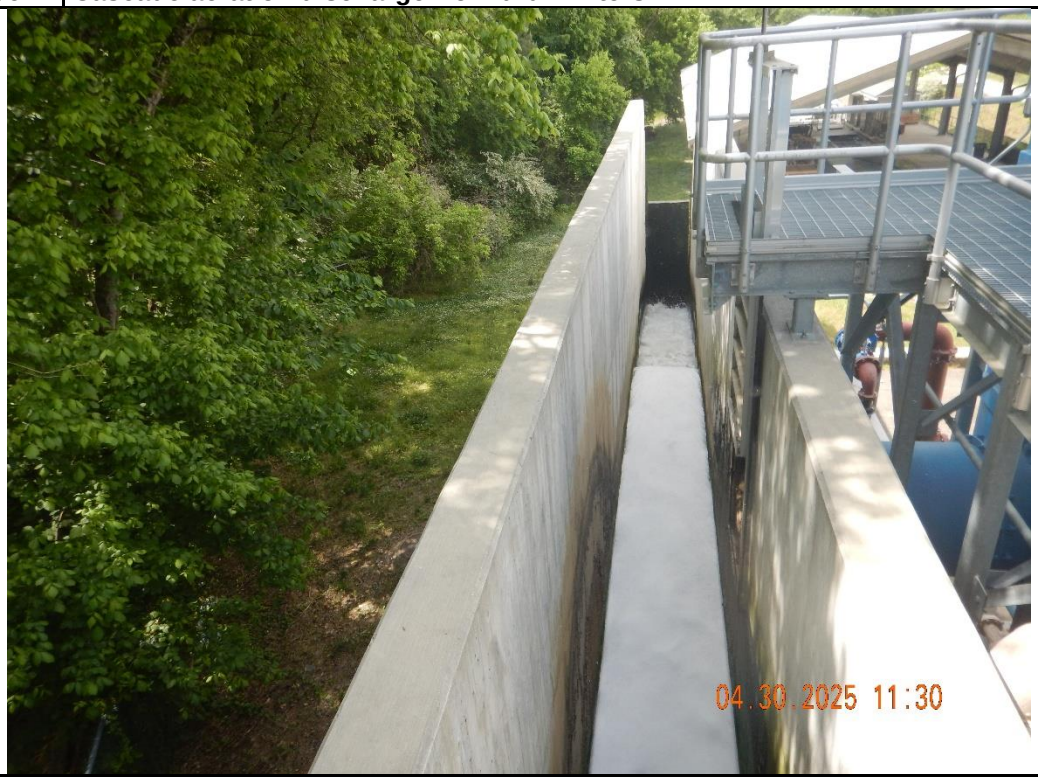
Photographer:	**Travis Harmon**	Date:	**April 30, 2025**	Time:	**1128**
Witness:	**None**			Photo #:	**8**
Description:	**Two drum filters**				

Office of Water Quality Photographic Evidence Sheet					
Location:	**Hot Springs- Davidson WWTP**				
Photographer:	**Travis Harmon**	Date:	**April 30, 2025**	Time:	**1129**
Witness:	**None**			Photo #:	**9**
Description:	**Drum filter offline for maintenance during low influent**				

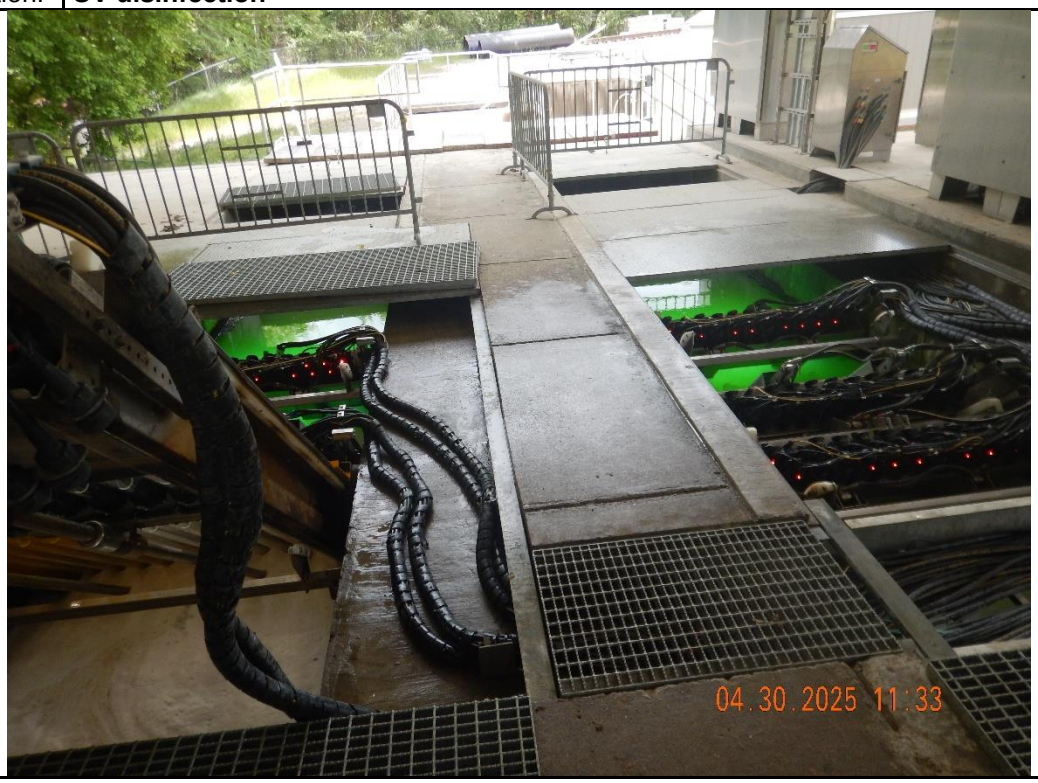
Photographer:	**Travis Harmon**	Date:	**April 30, 2025**	Time:	**1130**
Witness:	**None**			Photo #:	**10**
Description:	**Drum filter effluent**				



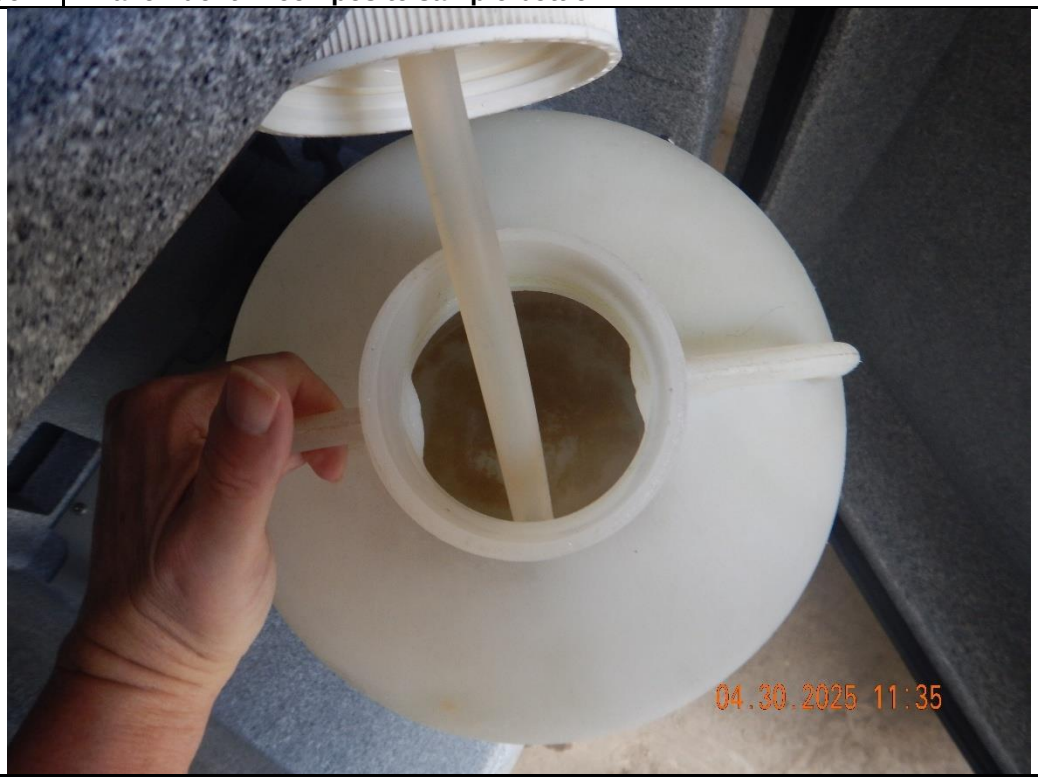
Office of Water Quality Photographic Evidence Sheet					
Location:	**Hot Springs- Davidson WWTP**				
Photographer:	**Travis Harmon**	Date:	**April 30, 2025**	Time:	**1130**
Witness:	**None**			Photo #:	**11**
Description:	**Cascade aeration discharge from drum filters**				



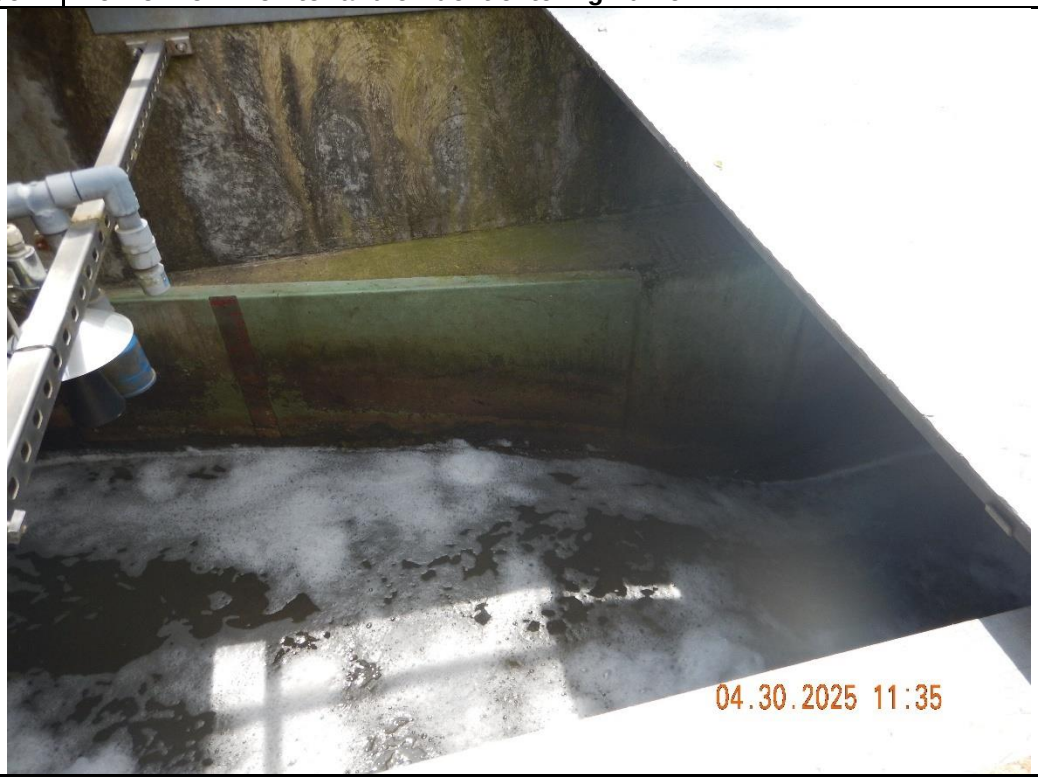
Photographer:	**Travis Harmon**	Date:	**April 30, 2025**	Time:	**1133**
Witness:	**None**			Photo #:	**12**
Description:	**UV disinfection**				



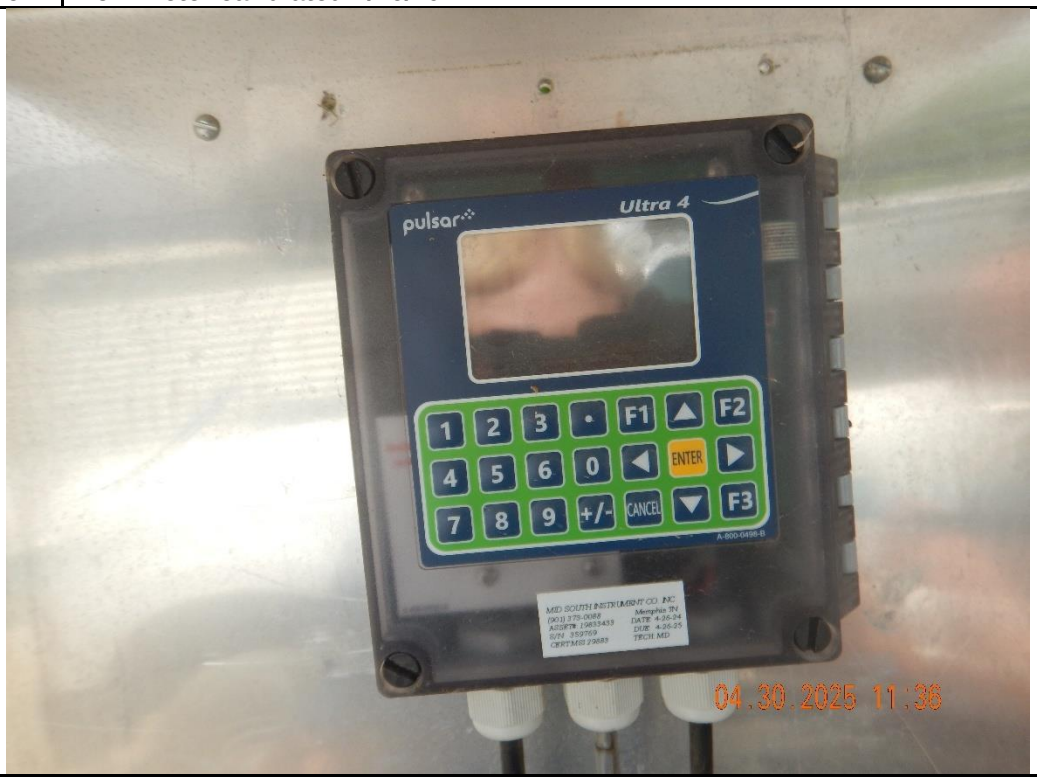
Office of Water Quality Photographic Evidence Sheet					
Location:	**Hot Springs- Davidson WWTP**				
Photographer:	**Travis Harmon**	Date:	**April 30, 2025**	Time:	**1135**
Witness:	**None**			Photo #:	**13**
Description:	**Final effluent in composite sample bottle**				



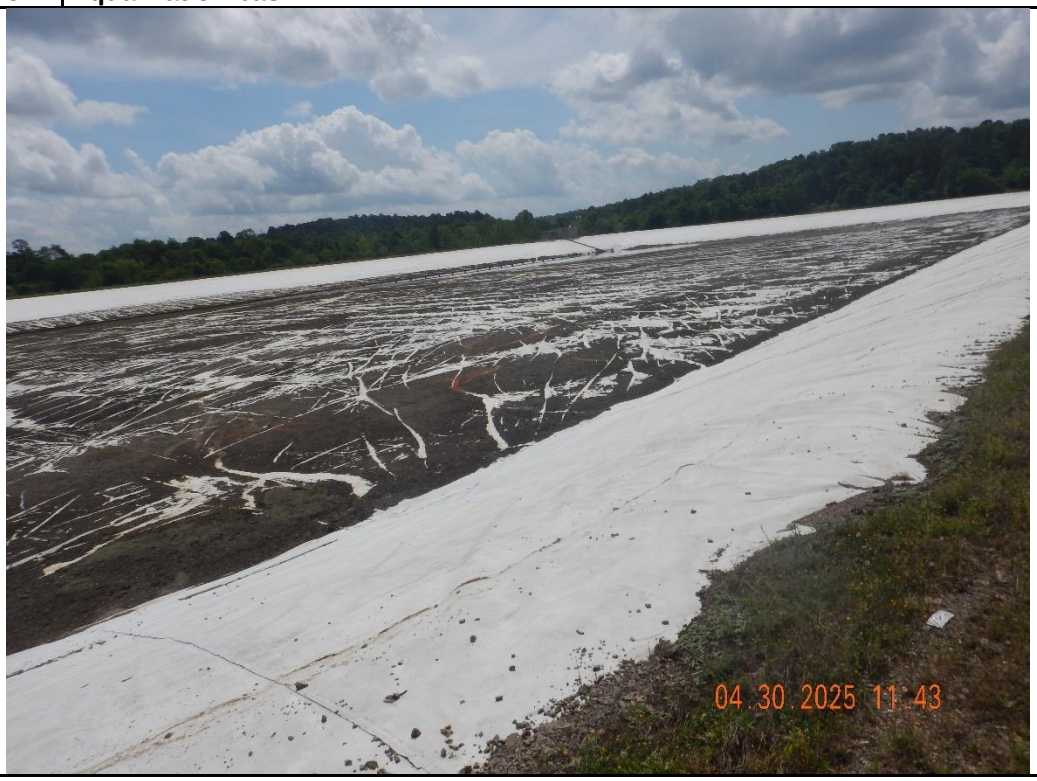
Photographer:	**Travis Harmon**	Date:	**April 30, 2025**	Time:	**1135**
Witness:	**None**			Photo #:	**14**
Description:	**View of flow monitor and effluent entering flume**				



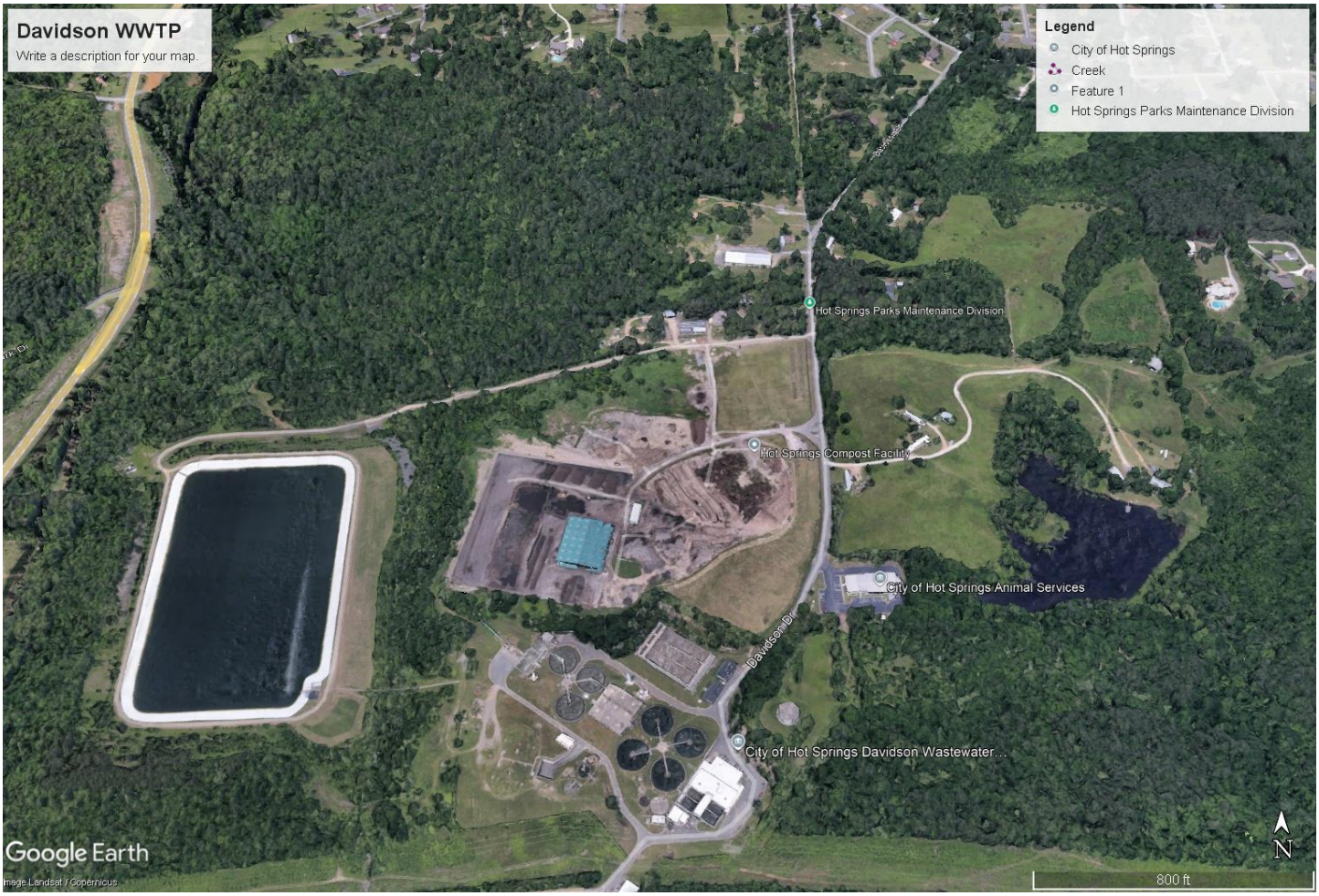
Office of Water Quality Photographic Evidence Sheet					
Location:	**Hot Springs- Davidson WWTP**				
Photographer:	**Travis Harmon**	Date:	**April 30, 2025**	Time:	**1136**
Witness:	**None**			Photo #:	**15**
Description:	**Flow meter calibrated 4/26/2024**				



Photographer:	**Travis Harmon**	Date:	**April 30, 2025**	Time:	**1143**
Witness:	**None**			Photo #:	**16**
Description:	**Equalization basin**				



Google Earth:



From: Monty Ledbetter <MLedbetter@cityhs.net>
Sent: Friday, June 20, 2025 12:45 PM
To: Water-Inspection-Report@adeq.state.ar.us; Uniqika Marshall (adpce.ad)
Cc: Harold Mauldin
Subject: Hot Springs Davidson WWTP Inspection Response
Attachments: ADEQ Inspection Letter Response 2025.docx

Importance: Low

Follow Up Flag: Follow up
Flag Status: Flagged

Thanks for bringing this to our attention. Let us know if there's anything else that you need.

CITY OF HOT SPRINGS

Davidson Wastewater Treatment Plant

320 Davidson Drive
Hot Springs, Arkansas 71901

June 18, 2025

Water Inspection Report
Attention: Uniqika Marshall
Administrative Assistant
Division of Environmental Quality
5301 Northshore Drive
North Little Rock, AR. 72118

RE: Hot Springs- Davidson WWTP Inspection (Garland County) – PDS# 133392, 133393
AFIN: 26-00145 Permit No.: AR0033880

To whom it may concern,

On Wednesday, June 18th 2025, the Davidson Wastewater Treatment Plant and Collection System (Permit Number AR0033880) received a Compliance Evaluation Inspection by Travis Harmon. Under 'Summary of Findings', one comment was made concerning Biomonitoring. It read, 'The facility should contact the contract lab and update Biomonitoring dilution series to 17,23,31,41, and 55% per Part II.10 of the permit. The March 2025 test used 24,33,44,58, and 77%.'

On Wednesday, June 18th 2025, I contacted John Overbey, Business Unit Manager, and spoke to him about the changes to the dilutions. He downloaded the permit and assured me that he would make the appropriate changes to the dilution series, beginning with the next test. He assured me that the previous tests would have passed the current dilution series.

If you have any questions or need more information, please let me know.

Kindest regards,

Harold Mauldin
Facilities Operations Manager
City of Hot Springs

Monty Ledbetter
Utilities Director

Hot Springs Utilities Department

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