



ARKANSAS

ENERGY & ENVIRONMENT

Facility: Searcy Board of Public Utilities AR0021601

MEETING ATTENDANCE

Date: June 20, 2024, at 2:00 p.m.

Name	Organization	Job Title	E-Mail Address	Telephone Number
Richard Healey	DEQ	Enforcement Branch Manager	richard.healey@arkansas.gov	501-682-0640
Leslie Allen-Daniel	DEQ	Enforcement Coordinator	leslie.allen-daniel@arkansas.gov	501-682-0630
Rachel Wilcox	DEQ	Enforcement Analyst	rachel.wilcox@arkansas.gov	501-682-0858
Kayla Grabinski	DEQ	Enforcement Analyst	kayla.grabinski@arkansas.gov	501-682-0647
Joe Martin	DEQ	Interim Deputy Associate Director	joe.m.martin@arkansas.gov	
Stacie Wassell	DEQ	Associate Director	stacie.wassell@arkansas.gov	
Scotty Boggs	Searcy Water Ut.	Asst. GM	s.boggs@searcywater.org	501-268-2481
Daniel Dawson	Searcy Water	Gen. Mgr.	d.dawson@searcywater.org	501-268-2481
PAUL STRICKLAND	GARVER	SL. PROJECT MGR	JPSTRICKLAND@GARVERUSA.COM	501-537-3408
JERRY T. MARTIN	GARVER	Project Manager	JTMartin@garverusa.com	479-287-4653

REMARKS:

Meeting Minutes

DEQ Meeting with the Searcy Board of Public Utilities

Thursday, June 20, 2024, at 2 p.m.

1. Introductions
2. Opening Remarks from Dan Dawson
 - a. Proposed Consent Administrative Order (CAO) has two main issues:
 - i. Untimely submittal of the permit renewal application
 - ii. SSOs
3. Permit Application
 - a. Signatures and data tables were missing from the application.
 - b. A permit application is considered late if it is not administratively complete.
 - i. Searcy stated an application was submitted to DEQ on November 1, 2023, to the front desk. Said another was resubmitted on November 13, 2023.
 - ii. Application was missing information and was deemed administratively incomplete.
 - iii. Signatures, especially those from the responsible official, are EPA requirements.
4. SSO Mitigation Efforts & Schedule
 - a. Efforts to resolve SSOs began in 2016 with a Sewer System Flow Study
 - b. The locality is broken up into eight basins.
 - i. The collection systems from all basins flow into RG2 indicated on the attached map.
 - ii. Basin 7 was the largest problem area with the greatest influx of inflow and infiltration (I&I).
 - c. After a little over 2 years of work, the City of Searcy realized they needed a rate increase to pay for future improvements.
 - d. After Basin 7 was completed in three years, Garver developed a plan for moving forward.
 - e. There has only been 1 SSO in basin 7 since it was completed.
 - f. The remaining basins will be completed in June 2025.
 - g. Corrective Action Plan (CAP)
 - i. In March of 2019, DEQ requested a CAP.
 - ii. In May of 2019, the City of Searcy submitted a CAP with a final compliance date of December 2027.
 - iii. DEQ never followed up on that CAP, but City of Searcy proceeded with the CAP.
 1. If DEQ had, Facility would have likely been placed under a CAO at that time.
 - h. City of Searcy indicated half a dozen manholes in interceptor areas make up most of the SSOs.
 - i. Reporting of SSOs determined by clear well level which is used to determine when overflows are occurring.
 - i. Staff goes out and checks common problem areas and estimates overflow.
5. CAO
 - a. Facility requested a rescindment or voiding of CAO.

- b. Facility requested a consideration of factors.
 - i. Over \$8 million dollars spent so far on improvements.
 - ii. 92% of the overflow volume came from one rain event which resulted in a power failure.
 - 1. In the future, Facility should submit an upset report if a similar incident occurs.
 - c. Permit Renewal
 - i. Commencement of review was delayed by ARPA based construction permits which had to take priority.
 - ii. Renewal Permit for the City of Searcy is in peer review.
 - iii. If an administratively complete permit application had been submitted on time the coverage would have been administratively continued until the renewal permit was issued.
 - d. Benefits of CAO
 - i. SSO violations would be covered.
 - ii. Protects from citizen lawsuits.
 - iii. Help prioritize funding and get funding.
 - e. Compliance Definition
 - i. Compliance with SSOs determined by completion of corrective actions in CAP.
 - ii. Compliance with late permit app is determined by issuance of new permit.
 - f. Penalty
 - i. Penalty is calculated based on Rule 7.
 - ii. Penalty for SSOs was calculated per year instead of per violation.
 - iii. City of Searcy can request a reasonable reduction in writing with a justification saying what's been done.
 - 1. Off will be reviewed by Director who makes final decision.
6. Action Items.
- a. By July 10th, City of Searcy will submit a penalty reduction request with a final compliance date that can be incorporated into the revised CAO.
 - b. DEQ will create and present a revised CAO.
 - c. DEQ will check on status of the construction permit for plant improvements and inform the City of Searcy.
 - d. DEQ will send information from the City of San Diego on how to estimate overflows.



City of San Diego
Metropolitan Wastewater Department

Reference Sheet for Estimating Sewer Spills from Overflowing Sewer Manholes

All estimates are calculated in gallons per minute (gpm)

Wastewater Collection Division
(619) 654-4160



5 gpm



25 gpm



50 gpm



100 gpm



150 gpm



200 gpm



225 gpm



250 gpm



275 gpm

All photos were taken during a demonstration using metered water from a hydrant in cooperation with the City of San Diego's Water Department.

rev. 4/99

City of San Diego Manhole Overflow Picture Chart