

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	11/20/2024	
Media Program:	Drinking Water	
Regulatory Program(s)	Safe Drinking Water Act (SDWA)	
System Owner:	City of Bentonville	
System Name:	Bentonville Water Utilities	
System Physical Location:	3200 SW Municipal Dr.	
(city, state, zip code)	Bentonville, AR 72712	
Mailing address:	1000 SW 14 th St	
(city, state, zip code)	Bentonville, AR 72712	
County/Parish:	Benton County	
System Phone Number	479-271-3140	
System Contact:	Dustin Youngblood	Operations Supervisor
	dyoungblood@bentonvillear.com	
System Classification:	Community Water System (CWS)	
PWS ID:	AR0000041	
Media Identifier Number:	N/A	
NAICS:	221310	
SIC:	4941	
Personnel participating in inspection:		
Mariela Reyna	EPA Region 6	Inspector
Mike McFadden	ERG	Inspector
Annie Dubner	ERG	Inspector
Adam Parker	Arkansas Department of Health (ADH)	District Engineer
Preston Newbill	City of Bentonville	Deputy Director
Beau Thompson	City of Bentonville	Technical Manager
Donald Schmidt	City of Bentonville	Operations/Maintenance Manager
Dustin Youngblood	City of Bentonville	Operations Supervisor
Don Chase	City of Bentonville	System Administrator
Mike Bender	City of Bentonville	Water Utilities Director
Loran Shipman	City of Bentonville	Assistant Manager
Joey Ingle	City of Bentonville	Technical Services Assistant Manager
EPA Lead Inspector Signature/Date		12/20/2024
	Michael J. McFadden	Date
Supervisor Signature/Date	RUBEN ALAYON-GONZALEZ	Digitally signed by RUBEN ALAYON-GONZALEZ Date: 2025.01.29 14:10:10 -06'00'
	Ruben Alayon-Gonzalez	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

On November 20, 2024, United States Environmental Protection Agency (EPA) and the EPA contract inspectors from Eastern Research Group (ERG) (hereinafter the EPA inspection team) conducted an announced Compliance Evaluation Inspection under Section 1445 of the Safe Drinking Water Act (SDWA), 42 U.S.C. §300j-4, of City of Bentonville Public Water System (referred to as the System or City of Bentonville) (AR0000041). The inspection process began at approximately 9:00 a.m. on November 20, 2024, and finished at approximately 3:40 p.m.

Mariela Reyna of EPA Region 6 and Mike McFadden and Annie Dubner of ERG presented their SDWA inspector credentials to System representatives during the opening conference. The EPA inspection team informed the System representatives that this was an EPA inspection to determine compliance with SDWA Section 1433, which requires community water systems that serve more than 3,300 people to complete a Risk and Resilience Assessment (RRA) and develop an Emergency Response Plan (ERP). The EPA inspection team also informed System representatives that they would be conducting a cybersecurity evaluation concurrent with the Section 1433 review. To facilitate the inspection process, the EPA inspection team used a checklist outlining the requirements of SDWA Section 1433 during the document review. Refer to Appendix 1, Opening & Closing Conference Sign-In Sheet.

SYSTEM DESCRIPTION

According to System representatives, the System is owned by the City of Bentonville, serves a population of approximately 60,141, and has approximately 26,000 service connections. The System is a community water system as defined by 40 C.F.R., Part 141 Subpart A. The System serves the City of Bentonville plus four other consecutive systems:

- Oakhills Suburban Improvement District (AR0000676)
- Bella Vista Property Owners Association (POA) (AR0000039)
- Cave Springs Waterworks (AR0000043)
- Old Bella Vista POA (AR0000753)

The City of Bentonville purchases all treated water from Beaver Water District (AR0000038) through an agreement between the two systems. The System conveys water under pressure from Beaver Water District through a 48-inch transmission main to the distribution system. The design capacity of the transmission main is 40 million gallons per day (MGD), though the System can receive only approximately 30 MGD due to hydraulic restriction at the point where the 48-inch main splits into two 24-inch mains. The City of Bentonville currently has a capital project in the design phase to extend the 48-inch main to the I Street Pump Station to improve actual capacity. The System's average daily demand and peak day demand are approximately 20 MGD and 27 MGD, respectively. The City of Bentonville also has two emergency connections to Rogers Water Utilities (AR0000055) with a combined capacity of approximately 17 MGD. The System provides no additional water treatment to the purchased water.

The City of Bentonville has five storage tanks with a total capacity of 12.5 million gallons (MG). The System stated that this volume is equivalent to approximately 20 hours of storage, not including demand from its consecutive systems. The consecutive systems can be supplied by other sources if the City of Bentonville loses supply. The System has one primary pumping station, I Street Pump Station, with a capacity of 9 MGD. Beaver Water District can provide additional pumping capacity if needed based on the water levels in the City of Bentonville tanks.

The City of Bentonville's Water Utilities includes the operation and maintenance of water distribution, wastewater treatment, and sewer collection. Some positions include responsibilities across multiple departments. The System has a dedicated staff person to manage its cross-connection control program. The operations and maintenance teams work from 7:30 a.m. to 4:00 p.m. and have rotating staff members to ensure that there is always four staff members on call for emergencies. The System does not currently have a formal hydrant flushing or valve exercising program in place. Hydrant flushing is conducted in response to customer complaints and System representatives stated they usually receive 10 to 15 complaints per year. The System representatives also stated that a percentage of its valves are turned throughout the system in response to construction projects but there is no formal valve exercising program.

Section II – INSPECTION ACTIVITY SUMMARY

I Street Pump Station & Downtown Tank Site Visit

The EPA inspection team visited the I Street Pump Station and Downtown Tank starting at 1:10 p.m. local time. Photographs taken during the site visits are presented in [Appendix 2, Photograph Log](#). The I Street Pump Station is fenced with a locked gate and is the primary office location for the water operators where the SCADA system room is housed. Water operators can access the SCADA system to acknowledge alarms and make changes remotely. Beaver Water District has view-only access to the System's SCADA system.

The System uses its institutional knowledge and a partially implemented work order program (Central Square) to conduct its maintenance activities. The System is planning to incorporate Cityworks, a Computerized Maintenance Management System (CMMS), into its maintenance activities in 2026.

The I Street Pump Station has two 75 horsepower (hp) pumps and two 250 hp pumps with variable frequency drive (VFD) control, which can be run in automatic or manual mode (refer to [Appendix 2, Photograph 1](#)). The pumps draw water from the System's 3 MG and 6 MG I Street Pump Station Tanks (refer to [Appendix 2, Photograph 2](#)) to fill the System's remaining three tanks. The System also monitors chlorine at the pump station (refer to [Appendix 2, Photograph 3](#)). The pump station is equipped with an on-site generator with the capacity to operate the pump station at full capacity for approximately 30 hours (refer to [Appendix 2, Photograph 4](#)).

The two I Street Pump Station Tanks (3 MG and 6 MG) are welded steel ground tanks, which are inspected and maintained regularly through a contracted service (Utility Services). The tanks are equipped with acceptable security measures and professionally installed, industry-standard features

such as ladder access, rooftop vents, overflows, and level indication. The 6 MG tank uses passive mixing, and the 3 MG tank is equipped with an active mixer to maintain water quality. The exterior foundations, sidewalls, and coatings appeared to be in good condition.

The Downtown Tank is an elevated tank that was constructed in 1953. The tank is fenced with a locked gate (refer to [Appendix 2, Photograph 5](#)). Due to the tank's location and proximity to an elementary school, the city has not installed barbed wire fencing. The tank is gravity-filled and equipped with a control valve to avoid overfilling. The System uses the tank to supply water to the downtown distribution system via pump control at the I Street Pumping Station. The System has not deemed supply and pump operation critical to daily operation, but they operate it daily to turn over the water in the tank and maintain its operation for emergency use. The pump station consists of one low-capacity pump without an alternative power supply.

Document Review

The EPA inspection team reviewed the System's RRA and ERP onsite. The System certified the completion of its RRA and ERP on December 2, 2020 and May 20, 2021, respectively. The EPA inspection team observed that the initial RRA was updated in November 2024 and reviewed the updated version during the inspection. The System developed its RRA with contractor support. The System did not include Beaver Water District assets in the RRA as these assets are owned, operated, and maintained by Beaver Water District. The next EPA five-year submission cycle RRA deadline is December 31, 2025.

The System maintains hardcopies of its ERP. The contact information had been updated in 2024. The next EPA five-year submission cycle ERP deadline is June 30, 2026.

Section III – OBSERVATIONS

SDWA Section 1433(b)

Section 1433(b) of the SDWA requires a CWS serving a population greater than 3,300 to prepare or revise, where necessary, an ERP that incorporates the findings of the RRA no later than six months after completion of its RRA. The ERP shall include:

d) Strategies that can be used to aid in the detection of malevolent acts or natural hazards that threaten the security or resilience of the system.

Observation 1. The ERP did not include strategies to improve the resilience of the water system. The RRA includes strategies to improve resilience that could be included in the ERP through inclusion or reference to other documents such as a capital improvement plan.

National Primary Drinking Water Regulations Title 40 CFR 141.63(e)(3) states, "The Administrator, pursuant to section 1412 of the Act, hereby identifies the following as the best technology, treatment techniques, or other means available for achieving compliance with the maximum contaminant level for total coliforms...and for achieving compliance with the maximum contaminant level for E. coli...:(1) Protection of wells from fecal contamination by appropriate placement and construction; (2) Maintenance of a disinfectant residual throughout the distribution system; (3) Proper maintenance of the distribution system including appropriate pipe replacement and repair procedures, main flushing

programs, proper operation and maintenance of storage tanks and reservoirs, cross connection control, and continual maintenance of positive water pressure in all parts of the distribution system;”

ADH Rules & Regulations Pertaining to Public Water Systems, Section XIV Distribution System, B System Design, 4 Valves, states “...All valves shall be tested for leakage and operation by routine inspection at frequent intervals...”

Observation 2. System representatives stated they do not have a formal valve exercising program.

Observation 3. System representatives stated they do not have a formal hydrant flushing program.

AWWA Standard G200-15 Distribution Systems Operation and Management, 4.3.2.2 states, “The utility shall have written maintenance procedures for each pumping station (including emergency power generating equipment) describing frequency, procedures, and maintenance of records. Information shall include basic manufacturer operating requirements. Records shall document all inspections and any other service performed.”

Observation 4. The System does not have a fully implemented preventative maintenance program with work orders, inventory, and recordkeeping aspects.

AWWA Standard, G200-15 Distribution Systems Operation and Management, 4.3.1.2 states, “The utility shall have written operating procedures, which provide guidance on water level fluctuations in the storage facilities and turnover rates addressing specific supply one and seasonal supply conditions.”

Observation 5. The System does not have fully implemented and updated standard operating procedures. The System representative stated that there are some written procedures, but they may be outdated and are not consolidated. System representatives could not immediately locate them during the inspection of the I Street Pump Station.

AWWA Standard G100-11 Water Treatment Plant Operation and Management, 4.3.1.4 states, “... The utility shall conduct an external visual inspection of the storage facility at least seasonally to assess and repair environmental damage and verify the integrity of vents and screens. The inspection shall include an assessment of the physical security of the facility.”

Observation 6. There is no ‘No Trespassing’ signage on the fencing around the tanks.

ADH Rules & Regulations Pertaining to Public Water Systems, Section XI Potable Water Storage Tanks, D Design and Operation states, “Sufficient useable storage shall be provided with consideration given to average daily demand, peak hourly demand, power outages, and fire flows, if applicable.”

Observation 7. The System has five tanks with a total storage capacity of 12.5 MG to serve the average daily demand of approximately 20 MG. If the Beaver Water District supply would be lost during an emergency, the System has less than a two-day supply, notwithstanding other interventions. System representatives acknowledged that typical storage levels and useable capacity equate to less than one day of storage capacity.

AWWA Management Standard, G100-11 Water Treatment Plant Operation and Management, 4.3.2 states, “The plant shall have documentation of a cross-connection control and backflow prevention program or be part of a cross-connection control program run by another entity.”

Recommended Standards for Water Works (Ten States Standards), 2022 Edition, Section 2.11 states, “Sample taps shall be provided so that water samples can be obtained from each water source and from appropriate locations in each unit operation of treatment, and from the finished water. Taps shall be consistent with sampling needs and shall not be of the petcock type. Taps used for obtaining samples for bacteriological analysis shall be of the smooth-nosed type without interior or exterior threads...”

Observation 8. The EPA inspection team observed threaded sample taps at the I Street pump station and at the Downtown Tank (refer to Appendix B Photograph 6 and Photograph 7)

Section IV – CLOSING CONFERENCE

The EPA inspection team held a closing conference with System personnel at 3:15 p.m. on November 20, 2024, at the utility conference room. The EPA inspection team discussed preliminary observations identified during the field component of the inspection. The EPA inspection team reiterated to the System representatives that these preliminary observations were not compliance determinations. Preliminary observations shared during the closing conference are subject to further investigation by the EPA upon the review of additional records and documentation. Therefore, this inspection report may include observations that were not identified at the time of the closing conference.

Observations are described in Section III. Observations regarding the cybersecurity practices were shared with the System verbally. The inspection concluded at approximately 3:40 p.m.

Section V – FOLLOW UP

No additional information was requested or received by EPA after leaving the System on November 20, 2024. Based on the EPA Inspection Team’s review of the 2020 ERP, the following are offered for System consideration for the next 5-year ERP certification cycle:

- The ERP can be further developed to include additional actions needed to respond to a loss of water service.

The System described an emergency event that occurred in April 2024 when a drilling company compromised its 48-inch transmission main. Given the experience gained from that event, consideration of the System’s limited water storage capacity, and its limited capacity from emergency connections, the ERP could include more action steps and details in its loss of service response.

- The ERP can specify how the System has coordinated with emergency services in its development.

The System could include how coordination with emergency services was done to date and will be continued in the future with examples such as consideration of tabletop exercises that include local emergency service involvement.

- The ERP could incorporate more specific mention and response to natural hazards that could be reasonably expected to occur in the area (e.g., flooding, tornadoes) to supplement the general hazards that were included (i.e., loss of service, loss of power).

Section VI – LIST OF APPENDICES

Appendix 1: Opening & Closing Conference Sign-in Sheet

Appendix 2: Photograph Log

Appendix 1: Opening & Closing Conference Sign-in Sheet

Note: The checkmark indicates that the individual was present for both the opening and closing conferences.

System Name: Bentonville Water Utility
PWSID: AR0000041
Date: November 20, 2024

Contact List

Name	Title	Representing	Phone	Email
✓ Mariela Reyna	Enforcement Officer	EPA R6	(214) 665- 7177	Reyna.mariela@epa.gov
✓ Loran Shipman	Assistant Manager	City of Bentonville	479/271-3140	lshipman@bentonvillear.com
Mike Bender	Water Utilities Director	City of Bentonville	479-271-6873	mbender@bentonvillear.com
Don Chase	System Admin	City of Bentonville	479 413 7149	donchase@bentonville Arkansas.gov
✓ Preston Newbill	Deputy Director	City of Bentonville	479-271-3140	pnewb@bentonvillear.com
✓ Beau Thompson	BWU manager	City of Brille	479-271-3140	bthompson@bentonvillear.com
✓ Annie Durnane	Inspector	ERG	612-270-4150	annie.durnane@erg.com
✓ Donald Schmidt	Water Utilities O/M Manager	City of Bentonville	479-271-3140	dschmidt@bentonvillear.com
✓ Joey Ingle	Techn. Services Asst. Manager	City of Bentonville	479-271-3140	JIngle@bentonvillear.com
✓ Mike McFadden	Inspector	ERG/EPA	717-418-3573	mike.mcfadden@erg.com
✓ Dustin Youngblood	Operations Sup.	City of Bentonville	479-271-3140	dyoungblood@bentonvillear.com
✓ Adam Parker	ADH District Eng	ADH	661-2623 (501) 627	Adam.Parker@arkansas.gov

Appendix 2: Photograph Log

Unless otherwise indicated herein, all photographs were taken by Mike McFadden of ERG during the inspection. The displayed date and time are the local time (CST unless otherwise noted). Photographs were not manipulated beyond minor cropping for sizing and adding labels or callouts to draw attention to the subject of the photograph.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Location: City of Bentonville Public Water System		
City of Bentonville	County: Benton	State: Arkansas



Photograph 1. 11/20/2024 13:49

Description: I Street Pump Station. The pump station has two 75 hp pumps and two 250 hp pumps.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Location: City of Bentonville Public Water System		
City of Bentonville	County: Benton	State: Arkansas



Photograph 2. 11/20/2024 14:06
Description: I Street 6-MG Tank located on the same site as the I Street Pump Station.



Photograph Log

Location: City of Bentonville Public Water System		
City of Bentonville	County: Benton	State: Arkansas



Photograph 3. 11/20/2024 13:53
Description: I Street Pump Station. Chlorine residual is monitored at the pump station to confirm an adequate residual from Beaver Water District.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Location: City of Bentonville Public Water System		
City of Bentonville	County: Benton	State: Arkansas



Photograph 4. 11/20/2024 13:57

Description: I Street Pump Station. The on-site generator is sized to operate the entire pump station.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Location: City of Bentonville Public Water System		
City of Bentonville	County: Benton	State: Arkansas



Photograph 5. 11/20/2024 14:25

Description: Downtown Tank. The tank is fenced and locked, does not include barbed wire due to relationship with neighborhood partners, and does not have no trespassing signage.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Location: City of Bentonville Public Water System		
City of Bentonville	County: Benton	State: Arkansas



Photograph 6. 11/20/2024 13:51

Description: I Street Pump Station. Threaded sample tap on a finished water line.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Location: City of Bentonville Public Water System		
City of Bentonville	County: Benton	State: Arkansas



Photograph 7. 11/20/2024 14:34

Description: Downtown Tank. Threaded sample tap on a finished water line.