



May 3, 2012

Johnathan Long  
Wye Mtn. Facilities Board Waterline Extension  
Central Arkansas Water  
221 East Capitol Avenue  
PO Box 1789  
Little Rock, AR 72203

AFIN: 88-01384

NPDES Permit No.: ARR153738

Dear Johnathan Long:

On April 25, 2012, I performed a routine compliance inspection of the above referenced facility in response to a complaint. The complaint alleged silt fences installed incorrectly or taken down to move equipment across streams and polluting streams with dirt. The inspection was conducted in accordance with the provisions of the Federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, and the regulations promulgated thereunder. This inspection revealed the following violations:

1. The stormwater pollution prevention plan (SWPPP) is not properly signed as required by Part II,A.2.A of the permit. The individual conducting the onsite inspections has not signed the inspector certification in the SWPPP.
2. The stormwater pollution prevention plan (SWPPP) is not being updated as required by Part II,A.3 of the permit. Your contractor is using the vegetative debris along the pipeline construction as a BMP on the downhill side of the construction. While this is an acceptable practice and will help minimize the migration of silt and sediment on the site, this practice has not been included in the SWPPP. Also, please remember, your inspector must inspect these types of controls to ensure they are effective and are operating as desired.
3. The inspection forms being used onsite do not meet the requirements of Part II, A.4.L.2 of the permit. As I discussed with Mr. O'Hara, the form being used on the site was applicable to the previous construction stormwater permit, but did not contain all the elements required by the current version of the permit. I have already sent Mr. O'Hara a copy of the inspection form developed by ADEQ that meets the requirements of the permit. Please begin using these forms and update your SWPPP accordingly. Also, please note this also applies to the form being used at the site of the elevated storage tank.

4. Concrete is being washed out at locations other than the location indicated on the site map in violation of Part II, A.4.G.8 of the permit. The SWPPP for this project indicates concrete will be washed out at the concrete plant. However, there was evidence of concrete washout at the construction site for the elevated storage tank.
5. Velocity dissipation devices have not been installed at discharge points as required by Part II, A.4.G.3.b of the permit. Specifically, at the site of the elevated storage tank, a culvert was noted at the foot of the construction site that ran under the contractor's trailer and came out at the property line. Velocity dissipation needs to be installed on this stormwater outfall.
6. During the inspection a small oil spill that had not been cleaned up expeditiously was noted at the site of the elevated storage tank construction. Spills need to be cleaned up immediately.
7. The SWPPP does not contain information about employee training as required by Part II, A.4.N of the permit. The SWPPP must be updated to include this required element and it must be implemented.

The above items require your immediate attention. Please submit a written response to these findings to the Water Division Inspection Branch of this Department. This response should be mailed to the address at the bottom of the first page of the letter or e-mailed to [Water-Inspection-report@adeq.state.ar.us](mailto:Water-Inspection-report@adeq.state.ar.us). This response should contain documentation describing the course of action taken to correct each item noted. This corrective action should be completed as soon as possible, and the written response with all necessary documentation (i.e. photos) is due by May 14, 2012.

If I can be any assistance, please contact me at [benson@adeq.state.ar.us](mailto:benson@adeq.state.ar.us) or 501-683-0827.

Sincerely,



Dennis Benson  
District 9 Field Inspector  
Water Division



Form Approved  
OMB No. 2040-0003

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Washington, D.C. 20460

# NPDES Compliance Inspection Report

## Section A: National Data System Coding

Transaction Code						NPDES								Yr/Mo/Day							Inspec. Type		Inspector		Fac. Type																																
1	N					2	5				3	A	R	R	1	5	3	7	3	8	11						12	1	2	0	4	2	5	17						18	W					19	S					20	2				
Remarks																																																									
Inspection Work Days						Facility Evaluation Rating						BI		QA		-----Reserved-----																																									
67						69					70	N				71	N	72	N	73						74		75									80																				

## Section B: Facility Data

Name and Location of Facility Inspected ( <i>For industrial users discharging to POTW, also include POTW name and NPDES permit number</i> ) <b>Wye Mtn. Facilities Board Waterline Extension, Central Arkansas Water – From the NLR office go south on -430 to Highway 10 West exit. Go west on Highway 10 to Highway 113. The project extends from Wye Mtn south.</b>		Entry Time/Date <b>2:00 pm on 04/25/12</b>	Permit Effective Date <b>11/1/2011</b>
		Exit Time/Date <b>3:15 pm on 04/25/12</b>	Permit Expiration Date <b>10/31/2016</b>
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) <b>Joe O'Hara, 501-377-1338</b>			Other Facility Data
Name, Address of Responsible Official/Title/Phone and Fax Number <b>Johnathan Long</b> <b>Wye Mtn. Facilities Board Waterline Extension</b> <b>Central Arkansas Water</b> <b>221 East Capitol Avenue</b> <b>PO Box 1789</b> <b>Little Rock, AR 72203</b> <b>(501) 377-1343</b>		Contacted  Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	<b>PDS #065400</b>


### Section C: Areas Evaluated During Inspection

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

<b>S</b>	<b>Permit</b>	<b>N</b>	<b>Flow Measurement</b>	<b>M</b>	<b>Operations &amp; Maintenance</b>	<b>N</b>	<b>Sampling</b>
<b>U</b>	<b>Records/Reports</b>	<b>N</b>	<b>Self-Monitoring Program</b>	<b>N</b>	<b>Sludge Handling/Disposal</b>	<b>N</b>	<b>Pollution Prevention</b>
<b>M</b>	<b>Facility Site Review</b>	<b>N</b>	<b>Compliance Schedules</b>	<b>N</b>	<b>Pretreatment</b>	<b>N</b>	<b>Multimedia</b>
<b>M</b>	<b>Effluent/Receiving Waters</b>	<b>N</b>	<b>Laboratory</b>	<b>M</b>	<b>Storm Water</b>	<b>N</b>	<b>Other:</b>

## Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

**See NPDES Page 6 for violation details**

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Telephone/Fax Arkansas Department of Environmental Quality	Date <b>4/25/2012</b>
 <b>Dennis Benson</b>		
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date

**SECTION I: SITE POSTING AND SITE INFORMATION****SITE NAME: Wye Mtn. Facilities Board Waterline Extension TOTAL ACREAGE 20 ACREAGE DISTURBED 20****LATITUDE****LONGITUDE****STARTING DATE**

- |  |  |
|--|--|
| A. Is site is posted with Notice Of Coverage (NOC) <i>(Part II, A.2.D)</i>   | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| B. Is posting at construction entrance and visible to the public <i>(Part II, A.2.D)</i>   | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| C. If project is linear, is posting at area actively under construction? <i>(Part I,B.8.C)</i>   | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| D. If project is part of larger common plan of development, what is development name and permit number<br>Development Name: _____ Development Permit No: _____ |  |

**SECTION II: STORM WATER POLLUTION PREVENTION PLAN EVALUATION AND IMPLEMENTATION**

- |  |  |
|--|--|
| A. Is the SWPPP being maintained on site from 08:00 am to 5:00 pm <i>(Part II,A.2.A)</i> | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| B. Is the SWPPP properly signed as required by Part II,A.2.A of the permit?              | <input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| C. Is the SWPPP being updated as required by Part II,A.3 of the permit?                  | <input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |

**D. Site map in SWPPP *(Part II,A.4.F)***

- |   |  |
|---|--|
| 1) Pre-construction topographic view <i>(Part II,A.4.F.1);</i>  | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 2) Direction of stormwater flow (i.e., use arrows to show which direction stormwater will flow) and approximate slopes anticipated after major grading activities <i>(Part II,A.4.F.2);</i> | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 3) Delineate on the site map areas of soil disturbance and areas that will not be disturbed under the coverage of this permit <i>(Part II,A.4.F.3)</i>                                      | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 4) Location of major structural and nonstructural controls identified in the plan <i>(Part II,A.4.F.4)</i>  | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 5) Location of main construction entrance and exit <i>(Part II,A.4.F.5)</i>   | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 6) Location where stabilization practices are expected to occur <i>(Part II,A.4.F.6)</i>  | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 7) Locations of off-site materials, waste, borrow area, or equipment storage area <i>(Part II,A.4.F.7)</i>  | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 8) Location of areas used for concrete wash-out <i>(Part II,A.4.F.8)</i>  | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE            |
| 9) Location of all surface water bodies (including wetlands) <i>(Part II,A.4.F.9)</i>   | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 10) Locations where stormwater is discharged to a surface water and/or municipal separate storm sewer system if applicable <i>(Part II,A.4.F.10)</i>  | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 11) Locations where stormwater is discharged off-site (should be continuously updated) <i>(Part II,A.4.F.11)</i>  | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 12) Areas where final stabilization has been accomplished and no further construction phase permit requirements apply <i>(Part II,A.4.F.12)</i>   | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |

**E. Stormwater Controls**

- |   |  |
|---|--|
| 1) Are all controls installed as described in the SWPPP <i>(Part II,A.4.G)</i>  | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 2) Silt fences properly installed and maintained <i>(Part II,B.17.A)</i>  | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 3) Check dams and velocity dissipation devices properly installed and maintained <i>(Part II,B.17.A)</i>  | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 4) Sedimentation basins and sediment traps properly installed and maintained (sediment removed when 50% capacity) <i>(Part II,B.17.A) and (Part II,A.4.G.1.e)</i> | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE |
| 5) Has sediment that has gotten offsite been removed? <i>(Part II,A.4.G.1.d)</i>  | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE |
| 6) Is construction site entrance sufficiently stabilized to prevent off site tracking? <i>(Part II,A.4.H.2)</i>   | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 7) Are stabilization methods described in SWPPP being implemented in a timely manner? <i>(Part II,A.4.G.2)</i>  | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |

**F. Inspections**1) Inspection Frequency in SWPPP – ☒ Once every 7 days      ☐ 14 days and after ½ inch rain event

1a) If inspection frequency is every 14 days, do they have a rain gauge on site? (Part II, A.4.L.1.b)	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
1b) Is rain gauge properly installed? (nothing obstructing rain gauge) (Part II, B.17.A)	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
2) Are inspection records being maintained on site? (Part II, A.4.L.3)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3) Are ADEQ inspection forms being used or do the forms contain the elements required by the permit? (Part II, A.4.L.2)	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3a) Inspector Name and Title (Part II, A.4.L.2.a)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3b) Date of Inspection (Part II, A.4.L.2.b)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3c) Amount of Rainfall and Days Since Last Rain Event (only if inspection frequency is 14 days) (Part II, A.4.L.2.c)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3d) Approximate beginning and duration of the storm event (Part II, A.4.L.2.d)	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3e) Description of any discharges during inspection (Part II, A.4.L.2.e)	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3f) Locations of discharges of sediment/other pollutants (Part II, A.4.L.2.f)	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3g) Locations of BMPs in need of maintenance or where maintenance was performed (Part II, A.4.L.2.g)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3h) If the BMPs are in working order and if maintenance is required (when scheduled and completed) (Part II, A.4.L.2.h)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3i) Locations that are in need of additional controls (Part II, A.4.L.2.i)	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3j) Location and Dates When Major Construction Activities Begin, Occur or Cease (Part II, A.4.L.2.j)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3k) Report Signature of Inspector (Part II, A.4.L.2.k)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
4) Are inspections conducted in accordance with the requirements of the SWPPP? (Part II, A.4.L)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
5) Are corrective actions being implemented within 3 business days? (Part II, A.4.M)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE

**G. Stormwater management**

1) Is solid waste being controlled as described in SWPPP? (Part II, A.4.H.1)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
2) Are stabilized buffer zones being maintained? (25 feet from stream, 50 feet if 303 d, TMDL, ERW, ESW or NSW) (Part II, A.4.G.2.b)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3) Have velocity dissipation devices been installed at discharge points, within concentrated flow areas serving two or more acres and along drainage courses where required to prevent erosive flows (Part II, A.4.G.3.b)	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
4) Has silt or sediment gotten off the construction site? A.C.A. § 8-4-217(a)(2)	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
5) Has silt and sediment been discharged to the waters of the state? A.C.A. § 8-4-217(a)(2)	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
If yes, give the name of the stream or water body: _____	
6) Is the washout of concrete being done at the designated location? (Part II, A.4.G.8)	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
7) Does the liquid waste from concrete washout reach the waters of the state? (Part II, A.4.H.5)	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
8) Are fuel storage areas protected as described by SWPPP? (Part II, A.4.H.6)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
9) Have temporary erosion controls been removed from areas finally stabilized? (Part II, A.4.G)	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
10) Are there any allowable non-stormwater discharges that have not been addressed in the SWPPP (Part II, A.4.I)	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
11) Are there any process waters or non-stormwater discharges that are not allowed under the permit being discharged? A.C.A. § 8-4-217(b)(1)(E)	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
12) Does the SWPPP include the required information about employee training (dates of training, records of training, etc.) (Part II, A.4.N)	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE

## E. Comments and Observations:

**NPDES Compliance Inspection Report  
Further Explanation**

1. The stormwater pollution prevention plan (SWPPP) is not properly signed as required by Part II,A.2.A of the permit. The individual conducting the onsite inspections has not signed the inspector certification in the SWPPP.
2. The stormwater pollution prevention plan (SWPPP) is not being updated as required by Part II,A.3 of the permit. Your contractor is using the vegetative debris along the pipeline construction as a BMP on the downhill side of the construction. While this is an acceptable practice and will help minimize the migration of silt and sediment on the site, this practice has not been included in the SWPPP. Also, please remember, your inspector must inspect these types of controls to ensure they are effective and are operating as desired.
3. The inspection forms being used onsite do not meet the requirements of Part II, A.4.L.2 of the permit. As I discussed with Mr. O'Hara, the form being used on the site was applicable to the previous construction stormwater permit, but did not contain all the elements required by the current version of the permit. I have already sent Mr. O'Hara a copy of the inspection form developed by ADEQ that meets the requirements of the permit. Please begin using these forms and update your SWPPP accordingly. Also, please note this also applies to the form being used at the site of the elevated storage tank.
4. Concrete is being washed out at locations other than the location indicated on the site map in violation of Part II, A.4.G.8 of the permit. The SWPPP for this project indicates concrete will be washed out at the concrete plant. However, there was evidence of concrete washout at the construction site for the elevated storage tank.
5. Velocity dissipation devices have not been installed at discharge points as required by Part II, A.4.G.3.b of the permit. Specifically, at the site of the elevated storage tank, a culvert was noted at the foot of the construction site that ran under the contractor's trailer and came out at the property line. Velocity dissipation needs to be installed on this stormwater outfall.
6. During the inspection a small oil spill that had not been cleaned up expeditiously was noted at the site of the elevated storage tank construction. Spills need to be cleaned up immediately.
7. The SWPPP does not contain information about employee training as required by Part II,A.4.N of the permit. The SWPPP must be updated to include this required element and it must be implemented.



Water Division NPDES Photographic Evidence Sheet									
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<b>Location:</b>	Wye Mtn. Facilities Board Waterline Extension, Central Arkansas Water								
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<b>Photographer:</b>	Dennis Benson				<b>Witness:</b>	Mark Hathcote			
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<b>Photo #</b>	1	<b>Of</b>	6	<b>Date:</b>	4/25/2012	<b>Time:</b>	2:48 PM		
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<b>Description:</b>	Small oil spill that was not cleaned up expeditiously.								
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<b>Photographer:</b>	Dennis Benson				<b>Witness:</b>	Mark Hathcote			
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<b>Photo #</b>	2	<b>Of</b>	6	<b>Date:</b>	4/25/2012	<b>Time:</b>	2:50 pm		
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<b>Description:</b>	Stormwater outfall without velocity dissipation device installed. Culvert discharges onto adjacent property.								
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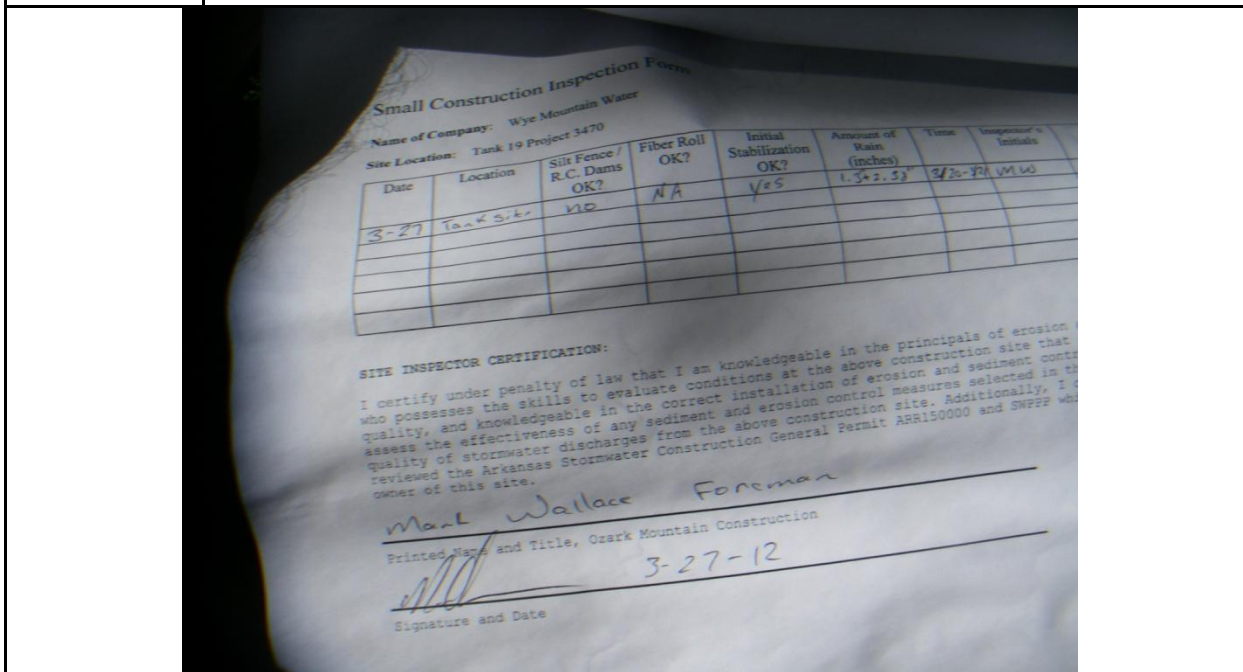


### Water Division NPDES Photographic Evidence Sheet

<b>Location:</b>	Wye Mtn. Facilities Board Waterline Extension, Central Arkansas Water						
<b>Photographer:</b>	Dennis Benson			<b>Witness:</b>	Mark Hathcote		
<b>Photo #</b>	3	<b>Of</b>	6	<b>Date:</b>	4/25/2012	<b>Time:</b>	2:53 pm
<b>Description:</b>	Concrete has been washed out in an unprotected area.						



<b>Photographer:</b>	Dennis Benson			<b>Witness:</b>	Mark Hathcote		
<b>Photo #</b>	4	<b>Of</b>	6	<b>Date:</b>	4/25/2012	<b>Time:</b>	2:48 pm
<b>Description:</b>	Inspection form used at site for elevated storage tank. Form does not meet the requirements of the permit.						





Water Division NPDES Photographic Evidence Sheet									
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<b>Location:</b>	Wye Mtn. Facilities Board Waterline Extension, Central Arkansas Water								
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<b>Photographer:</b>	Dennis Benson				<b>Witness:</b>	Mark Hathcote			
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<b>Photo #</b>	5	<b>Of</b>	6		<b>Date:</b>	4/25/2012	<b>Time:</b>	2:17 pm	
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<b>Description:</b>	View of linear project. Contractor is stabilizing ground with hay and grass seed.								
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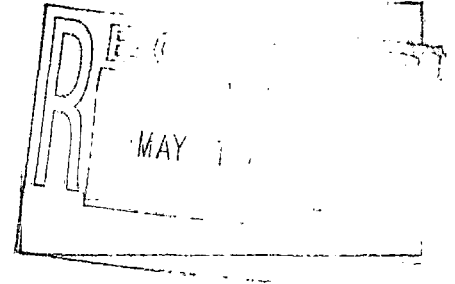


<b>Photographer:</b>	Dennis Benson				<b>Witness:</b>	Mark Hathcote			
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<b>Photo #</b>	6	<b>Of</b>	6		<b>Date:</b>	4/25/2012	<b>Time:</b>	2:17 pm	
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<b>Description:</b>	Where working near stream contractor has installed silt fence and implemented stabilization.								
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May 14, 2012

HAND DELIVERED

Dennis Benson  
District 9 Field Inspector Water Division  
ADEQ  
5301 Northshore Drive  
North Little Rock, AR 72118-5317

Dear Mr. Benson:

Pursuant to your comments regarding your inspection of the project Central Arkansas Water is managing, Wye Mt. Facilities Board Waterline Extension, we offer the following responses to your comments.

1. *The stormwater pollution prevention plan (SWPPP) is not properly signed as required by Part II, A.2.A of the permit. The individual conducting the onsite inspection has not signed the inspector certification in the SWPPP.*

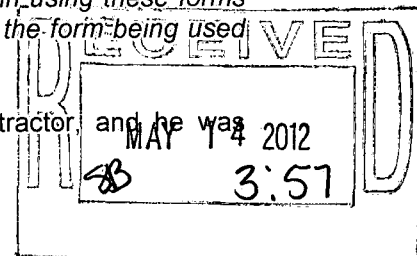
I personally witnessed the contractor who is responsible for inspections, Lee Pengelly, sign the certification on Thursday, May10, 2012.

2. *The SWPPP is not being updated as required by Part II, A.3 of the permit. Your contractor is using the vegetative debris along the pipeline construction as a BMP on the downhill side of the construction. While this is an acceptable practice and will help minimize the migration of silt and sediment on the site, this practice has not been included in the SWPPP. Also, please remember, your inspector must inspect these types of controls to ensure that they are effective and are operating as desired.*

I personally witnessed the contractor add "vegetative debris" to the legend on the SWPPP. The contractor later informed me that the SWPPP had been updated to show the use vegetative debris.

3. *The inspection forms being used onsite do not meet the requirements of Part II, A.3.L.2 of the permit. As I discussed with Mr. O'Hara, the form being used on the site was applicable to the previous construction stormwater permit, but did not contain all the elements required by the current version of the permit. I have already sent Mr. O'Hara a copy of the inspection form developed by ADEQ that meets the requirements of the permit. Please begin using these forms and update your SWPPP accordingly. Also, please note this also applies to the form being used at the site of the elevated storage tank.*

Electronic and hard copies of the new form have been provided to the contractor, and he was instructed to begin using that form.



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4. *Concrete is being washed out at locations other than the location indicated on the site map in violation of Part II, A.4.G.8 of the permit. The SWPPP for this project indicates concrete will be washed out at the concrete plant. However, there was evidence of concrete washout at the construction site for the elevated storage tank.*

Concrete placement at this site is complete. Therefore, no more washouts will occur.

5. *Velocity dissipation devices have not been installed at discharge points as required by Part II, A.4.G.3.b of the permit. Specifically, at the site of the elevated storage tank, a culvert was noted at the foot of the construction site that ran under the contractor's trailer and came out at the property line. Velocity dissipation needs to be installed on this stormwater outfall.*

Hay bales have been placed at the outfall of the culvert.



6. *During the inspection, a small oil spill that had not been cleaned up expeditiously was noted at the site of the elevated storage tank construction. Spills need to be cleaned up immediately.*

The small oil spill has been cleaned up.





7. *The SWPPP does not contain information about employee training as required by Part II, A.4.N of the permit. The SWPPP must be updated to include this required element and it must be implemented.*

Joe O'Hara and/or Jonathan Long have provided frequent and substantial training to the contractor performing the inspections before and during construction. However, we have failed to document this training. We will begin documenting any training and guidance we provide from this point forward.

Central Arkansas Water appreciates ADEQ's efforts in protecting water quality in the state, but specifically in the watersheds of our drinking water reservoirs. Protecting raw water quality in Lake's Maumelle and Winona for the 400,000 people who drink it is a top priority for us. We trust that our actions have satisfied your comments.

If you have any questions or need additional information, please feel free to contact me by phone at (501) 377-1343 or email at [Jonathan.Long@carkw.com](mailto:Jonathan.Long@carkw.com).

CENTRAL ARKANSAS WATER

A handwritten signature in blue ink, appearing to read "Jonathan Long". The signature is fluid and cursive, written over the printed name.

Jonathan Long, P.E.  
Watershed Administrator

Cc: Joe O'Hara, Central Arkansas Water  
Robert Hart, Central Arkansas Water





ARKANSAS  
Department of Environmental Quality

May 16, 2012

Johnathan Long  
Wye Mtn. Facilities Board Waterline Extension  
Central Arkansas Water  
221 East Capitol Avenue  
PO Box 1789  
Little Rock, AR 72203

Permit No.: ARR153738      AFIN: 88-01384

Dear Johnathan Long:

I have reviewed the response pertaining to my April 25, 2012 inspection of the Wye Mtn. Facilities Board Waterline Extension, Central Arkansas Water. The information provided sufficiently addresses the violations referenced in my inspection report. At this time the Department has no further comment concerning this particular inspection. Acceptance of this response by the Department does not preclude any future enforcement action deemed necessary at this site or any other site.

If we need further information concerning this matter, we will contact you. Thank you for your attention to this matter. Should you have any questions, feel free to contact me at 501-683-0827 or you may e-mail me at [benson@adeq.state.ar.us](mailto:benson@adeq.state.ar.us).

Sincerely,

A handwritten signature in blue ink that reads "Dennis Benson".

Dennis Benson  
District 9 Field Inspector  
Water Division

cc:    Water Division Enforcement Branch  
      Water Division Permits Branch