

March 1, 2011

Lester Herring, Water and Wastewater Superintendent City of Walnut Ridge 216 Southwest 4th Street Walnut Ridge, AR 72476

RE: Compliance Inspection

AFIN: 38-00040 NPDES Permit No.: AR0046566

Dear Mr. Herring:

On February 15, 2011, I performed a routine compliance inspection of the waste water treatment 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. The inspection revealed the following violation:

- 1. The Motorized Bar Screen was inoperative.
- 2. 2 Diffusers in the Oxidation Pond were not operating properly.

Both of the items listed above are a violation of Part III, Section B, 1, A, of the permit. On February 22, 2011, Jonathan Kopp, Plant Operator informed the Inspector that the Diffusers had been repaired. Since the Diffusers have already been repaired, there is no need for a response to the Department concerning that item.

Item #1 requires your immediate attention. Please submit a written response to this finding to Cindy Garner, Water Division Enforcement Branch Manager of this Department at the address located at the bottom of the first page of this letter. This response should contain detailed 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 documentation (i.e. pictures) is due by March 11, 2011.

For additional information you may contact the Enforcement Branch by telephone at 501-682-0639 or by fax at 501-682-0910.

Lester Herring, Water and Wastewater Superintendent City of Walnut Ridge March 1, 2011 Page 2

If I can be of any assistance, please contact me at 870-793-5819.

Sincerely,
Mike Kennedy

Mike Kennedy

District 11 Field Inspector

Water Division

cc: Water Division Enforcement Branch

Water Division Permits Branch

								T
3	EPA .							Form Approved OMB No. 2040-0003
		UNIT	ED STATES ENVIRONM	ENTAL PROTECTION	N AGENCY			
	NPDE							
			S	Section A: Nation	nal Data S	System Coding		
1	Transaction Code NPDES Yr/Mo/Day Inspect. Type Inspector Fac. Type 1 N 2 5 3 A R 0 0 4 6 5 6 6 11 12 1 1 0 2 1 4 17 18 C 19 S 20 1							
	A F I N 3	8	- 0 0 0	4 0	Remarks			
	Inspection Work Days]	Facility Evaluation R	ating	BI	QA	<u>'</u>	Reserved
	67 69		70 3	71	N 72	N 73 74 75		80
				Section 1	B: Facility	y Data		Ī
incli Wa l	ne and Location of Facility Inspected and POTW name and NPDES permit Inut Ridge Wastewater Treatment	num	ber)	harging to POTV	V, also	Entry Time/Date 1030 / 2-15-11		Permit Effective Date November 1, 2010
	7 Oak Street Inut Ridge, AR 72476 (Lawrend	ce Co	unty)			Exit Time/Date 1600 / 2-15-11		Permit Expiration Date October 31, 2015
Jon	ne(s) of On-Site Representative(s)/Teathan Kopp / Wastewater Plant Otter Herring / Water & Wastewater	perat	or / Cell 501-454-49	58			N3	
	ne, Address of Responsible Official/							
A.J.	Henry / Chairman / 870-886-231 Southwest 4th Street					Contacted		
	Inut Ridge, AR 72476					Yes No V		
						Yes No V		
						During Inspection tisfactory, N = Not Evaluated)		
S	Permit	S	Flow Measuremen			perations & Maintenance	S	Sampling
S	Records/Reports	S	Self-Monitoring F	Program	S	udge Handling/Disposal	N	Pollution Prevention
U	Facility Site Review	S	Compliance Sche	O	NI	retreatment	N	Multimedia
S	Effluent/Receiving Waters	S	Laboratory		NI	orm Water	N	Other:
	Emdeng Receiving Waters	Se		of Findings/Com		ttach additional sheets if necessar	y)	outer.
DN	IR's reviewed for October, Novem	ber a	and December 2010.	During the insp	pection, th	ne following violations of the perm	it we	re observed:
	-	ting _]	properly. They were	e spraying air ac	cross the t	op of the pond and not under the Diffusers had been replaced.	water	as designed.
	These items are a violation of Pa	art II	I, Section B, 1, A, of	the permit.				
	me(s) and Signature(s) of Inspector	r(s)		Agency/Office/				Date: February 25, 2011
19	like Kennedy.	orv	dv.	AR Dept. of Er 870-793-5819 /		ntal Quality-Batesville 5814		
	U Mike K	enne	uy					
Sig	nature of Reviewer			Agency/Office	/Phone an	d Fax Numbers		Date

ADEQ Water NPDES Inspection	AFIN: 38-00040	Permit #: AR0046566

SECTION A: PERMIT VERIFICATION		
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS	⊠s □m □	IU □NA □NE
DETAILS:		
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:	ØY	′ □N □NA □NE
SECTION B: RECORDKEEPING AND REPORTING EVALUATION		
RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT	☑s □m □	IU □NA □NE
DETAILS:		
1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS:	₫Y	′ □N □NA □NE
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE:	⊠s □m	I □U □NA □NE
a. DATES AND TIME(S) OF SAMPLING:	✓Y	′ □N □NA □NE
b. EXACT LOCATION(S) OF SAMPLING:	Øγ	′ □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: (Contract Laboratory)		I □U □NA ☑NE
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR:	□s □м	I □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 ☑	ÍU □NA □NE
DETAILS:		
1. TREATMENT UNITS PROPERLY OPERATED:	⊠s □m	I DU DNA DNE
2. TREATMENT UNITS PROPERLY MAINTAINED: Motorized Bar Screen was inoperable 2 Diffusers improperly operating - blowing across top of water in Oxidation Pond not under the water	□s □m	I ⊠U □NA □NE
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED: Backup Generators		I □U □NA □NE
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE: <u>Lights at Lift Stations & Scada System v</u> phones to all Wastewater personnel	vith ⊠s □m	I □U □NA □NE
ALL NEEDED TREATMENT UNITS IN SERVICE:	⊠s □m	I DU DNA DNE
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED: (2-Class III, 2-Class II, 1-Class-I)		I DU DNA DNE
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED:	⊠s □m	I DU DNA DNE
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE:		
9. STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED:		′ □N □NA □NE
10. PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED:		[′] □N □NA □NE
11. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR:		∕ ⊠N □NA □NE
12. IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED:		ON MA ONE
13. HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS:		' □N ØNA □NE
14. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT:		✓ ØN □NA □NE
15. IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT:		ON MA ONE

ADEQ Water NPDES Inspection	AFIN: 38-00040	Permit #: AR0046566

SI	ECTION D: SAMPLING	
	ERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS	☑S □M □U □NA □NE
	TAILS:	-
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
а	. SAMPLES REFRIGERATED DURING COMPOSITING:	☑Y □N □NA □NE
b	. PROPER PRESERVATION TECHNIQUES USED:	☑Y □N □NA □NE
С	. 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
SI	ECTION E: FLOW MEASUREMENT	
PE	RMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS	☑S □M □U □NA □NE
DE	ETAILS:	
1.	PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: 90 Degree V-Notch Weir Type of De	EVICE:
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: Last calibration dated 8-5-10	☑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
SE	ECTION F: LABORATORY	
PE	RMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS	☑S □M □U □NA □NE
DE	ETAILS:	
1.	EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(B) FOR SLUDGES) :	Øy □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:	Øy □n □na □ne
4.	QUALITY CONTROL PROCEDURES ADEQUATE:	Øy □n □na □ne
5.	DUPLICATE SAMPLES ARE ANALYZED ≥10% OF THE TIME:	Øy □n □na □ne
6.	SPIKED SAMPLES ARE ANALYZED ≥10% OF THE TIME:	Øy □n □na □ne
7.	COMMERCIAL LABORATORY USED:	☑Y □N □NA □NE
а	. LAB NAME: Arkansas Testing Laboratories	
b	. LAB ADDRESS: 204 East Lincoln Street, Searcy, AR 72143 Phone: 501-268-6431	
С	. PARAMETERS PERFORMED: Flow, CBOD, TSS, FCB, Ammonia Nitrogen, Chlorine Residual, pH & DO (Chronic Bio monitor	ing)
8.	BIOMONITORING PROCEDURES ADEQUATE:	☑Y □N□NA □NE
а	. PROPER ORGANISMS USED:	☑Y □N □NA □NE
b	. PROPER DILUTION SERIES FOLLOWED:	☑Y □N □NA □NE
С	. PROPER TEST METHODS AND DURATION:	⊠y □n □na □ne
d	. RETESTS AND/OR TRE PERFORMED AS REQUIRED:	☑Y □N □NA □NE

ADEQ Water NPDES Inspection	AFIN: 38-00040	Permit #: AR0046566

SEC	CTION	G: EFFLUE	NT/RECEIVIN	IG WATERS	OBSERVATION	ONS		
			ERVATIONS C				√S □M	□U □NA □NE
	AILS:							
	ALL #:	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	COLOR	OTHER
0	01	None	None	Light	Trace	None	Green	
					1			
SEC	CTION	H: SLUDGE	DISPOSAL					
SLU	DGE D	ISPOSAL ME	ETS PERMIT F	REQUIREMEN'	TS		□s □м	□U ☑NA □NE
DET	AILS:	No sludge dispe	osed during the	previous year	of 2010	•		
1. S	LUDGE M	ANAGEMENT ADEQU	ATE TO MAINTAIN EF	FLUENT QUALITY:			□s [IM □U ØNA □NE
2. S	LUDGE RI	ECORDS MAINTAINED	O AS REQUIRED BY 40) CFR 503:			□s [IM □U ØNA □NE
3. F	OR LAND	APPLIED SLUDGE, TY	PE OF LAND APPLIE	D TO: (E.G., FOREST	, <u>AGRICULTURAL</u> , PU	BLIC CONTACT SITE):		
SEC	CTION	I: SAMPLIN	G INSPECTION	ON PROCED	URES			
SAM	1PLE R	ESULTS WITH	HIN PERMIT R	EQUIREMENT	S		□s □m	□U ☑NA □NE
DET	AILS:							
1. S	AMPLES (OBTAINED THIS INSPI	ECTION:					□Y ØN □NA □NE
2. T	YPE OF S	AMPLE: ☐GRAB:	□COMPOSITE:_ N	METHOD: FREQUE	ENCY:			
3. S	AMPLES F	PRESERVED:						□y □n Øna □ne
4. F	LOW PRO	PORTIONED SAMPLE	S OBTAINED:				ļ	□y □n Øna □ne
5. S.	AMPLE O	BTAINED FROM FACIL	LITY'S SAMPLING DE\	/ICE:				□Y □N ☑NA □NE
6. S	AMPLE RI	EPRESENTATIVE OF	VOLUME AND NATUR	E OF DISCHARGE:				□Y □N ☑NA □NE
7. S	SAMPLE SE	PLIT WITH PERMITTE	E:					□Y □N ☑NA □NE
8. C	HAIN-OF-	CUSTODY PROCEDU	RES EMPLOYED:					□Y □N ☑NA □NE
9. S	AMPLES (COLLECTED IN ACCO	RDANCE WITH PERM	IT:			l	□y □n ☑na □ne
					VENTION PL			
		ATER MANAG	EMENT MEET	S PERMIT RE	QUIREMENTS			□U ☑NA □NE
	AILS:						<u> </u>	
1. S	WPPP UP	DATED AS NEEDED:	_ DATE OF LAST UP	DATE:				OY ON MA ONE
2. S	ITE MAP I	NCLUDING ALL DISCH	HARGES AND SURFA	CE WATERS:				OY ON MA ONE
		N PREVENTION TEAM						OY ON MA ONE
			PROPERLY TRAINED):				OY ON MA ONE
5. LI	IST OF PC	TENTIAL POLLUTAN	Γ SOURCES:					OY ON MA ONE
			AND PAST SPILLS ANI					OY ON MA ONE
			ARGES ARE AUTHOR	IZED:				OY ON MA ONE
		RUCTURAL BMPS:						□Y □N ☑NA □NE
		ON-STRUCTURAL BMF						□Y □N ☑NA □NE
		PERLY OPERATED AI						DY DN ØNA DNE
11. IN	NSPECTIO	NS CONDUCTED AS	KEQUIKED:					□Y □N ☑NA □NE

			FL	LOW C	<u> ALCUI</u>	LATIC	ON S	HEET					
Date: 2	<u>2-15-11</u>		Tim	ne: 13 3	35								
Head in Inc	hes:			Feet:			He	ad mea	sured i	n te	nths	from (chart
							in	Chlorine	Conta	ct C	ham	ber .	710
Type & Size	e of Pri	mary F	low Me	easurer	ment D	Device	e: 9	0 Degre	e V-No	tch	Weir	,	
Name & Mo	del of	Second	dary Fl	ow Mea	asuren	nent D	Devi	ce: ISC	CO 421	0 FI	ow N	/leter	
Date of last	Calibra	ation of	f Seco	ndary F	low D	evice:	: 8-5	5-2010					
Recorded F	low at	Date 8	k Time	Listed A	Above	: .70	02 M	GD		(Fac	ility Flo	ow Mete	er)
Calculated								MGD					
(Flow is calculat			ts in: ISC				easur	ement Har	ndbook-5	h Edi	<u>tion) (</u>	Table 9	.5)
	Red	corded		C	alculat		1						
% Error =		.702		686			X 100	2.33	%				
70 = 1101				686									
			Calc	ulated			1		Т				
% Error =													
70 21101													
					T								
% Error =				X 100									
75 = 1101													
					Т								
% Error =				X 100									
% Error =				%									
	<u>, </u>												
Comments:	OK	<u> </u>											

DMR Calculation Check

Reporting Period:	From	2010	Dec.	1	To	2010	Dec.	31
		Year	Month	Day		Year	Month	Day

Parameter Checked: Dissolved Oxygen

	Loading Mass		entration onthly
	Mo. Avg lbs/day	Mo. Avg mg/l	7 Day Avg mg/l
Reported Value:	N/A	8.1	N/A
		Inst. Min.	Inst. Min.
Calculated Value:	N/A	8.1	N/A
		Inst. Min.	Inst. Min.
Permit Value:	N/A	6	N/A
		Inst. Min.	Inst. Min.

If calculated value does not equal reported value, explain: \underline{OK}

NPDES Compliance Inspection Report Further Explanation

Section C, Item 2: The Motorized Bar Screen was inoperable. This is a violation of Part III, Section B, 1, A, of the permit.

Comments: 2 Diffusers not properly operating in Oxidation Pond observed on 2-15-11 were repaired on 2-22-11 as shown in photos sent to the Inspector from Walnut Ridge Wastewater Plant Operator, Jonathan Kopp. These diffusers did not interfere with the overall operation of the pond. This was also a violation of Part III, Section B, 1, A, of the permit, but as stated previously, the Diffusers have been repaired as of 2-22-11.

Compliance Schedules:

Section B, Item #1: Compliance with Part II, Condition #10 Total Residual Chlorine (TRC) limits in Section A1-Permit Limits. Review of months of October, November and December, 2010, did not exceed set limit on DMRs for the months listed.

Section B, Item #2: Compliance not due until October 1, 2013

Section B, Item #3: Compliance with Part II, Condition #11 Whole Effluent Toxicity Limits (7-Day Chronic NOEC Freshwater). Review of last Quarterly Test Results revealed passing of all limits in Section A1 – Permit Limits.

			Wate	er Division NPDES Phot	ographic E	vidence Sheet				
Location:	88	97 Oak	Street in	Walnut Ridge, Arkansas	(Lawrence	e County)				
Photographo	er:	Mike 1	Kennedy		Witness:	Jonathan Ko	pp			
Photo #	Photo # 1 Of 3 Date: 2-15-11 Time: 1323									
Description:		A viev	of the M	Iotorized Bar Screen that	slipped off o	of its track syste	em.			



 Photographer:
 Mike Kennedy
 Witness:
 Jonathan Kopp

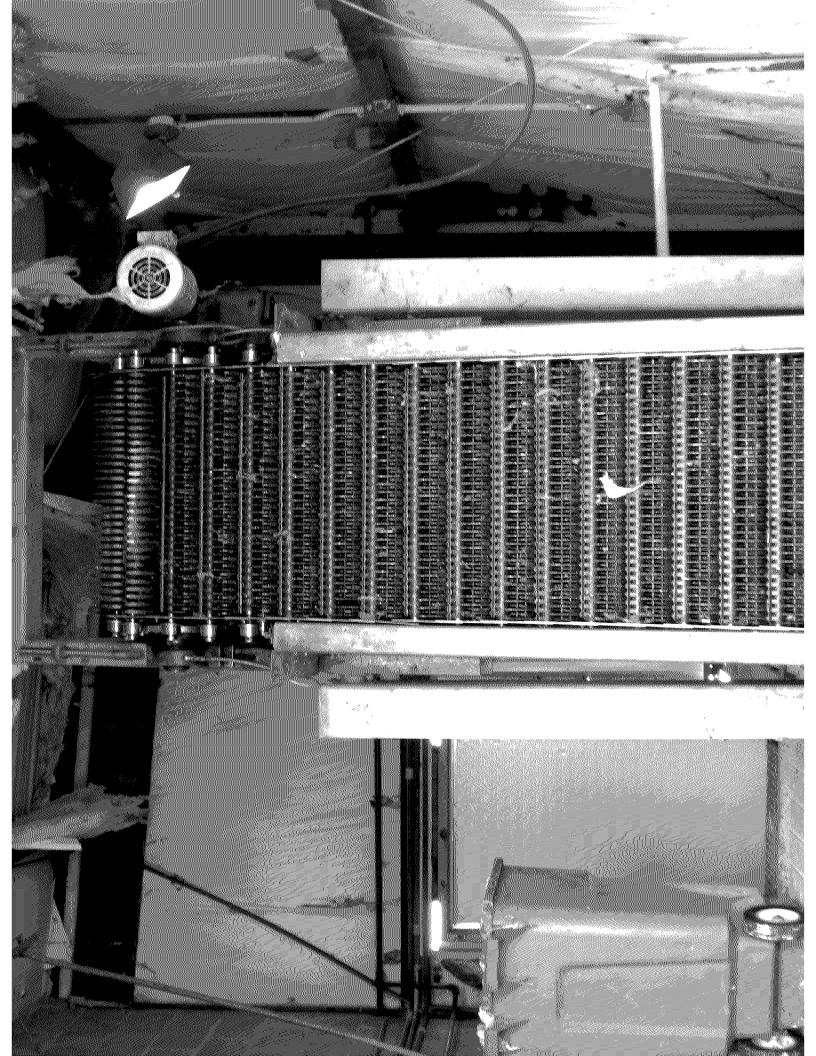
 Photo #
 2
 Of
 3
 Date:
 2-15-11
 Time:
 1143

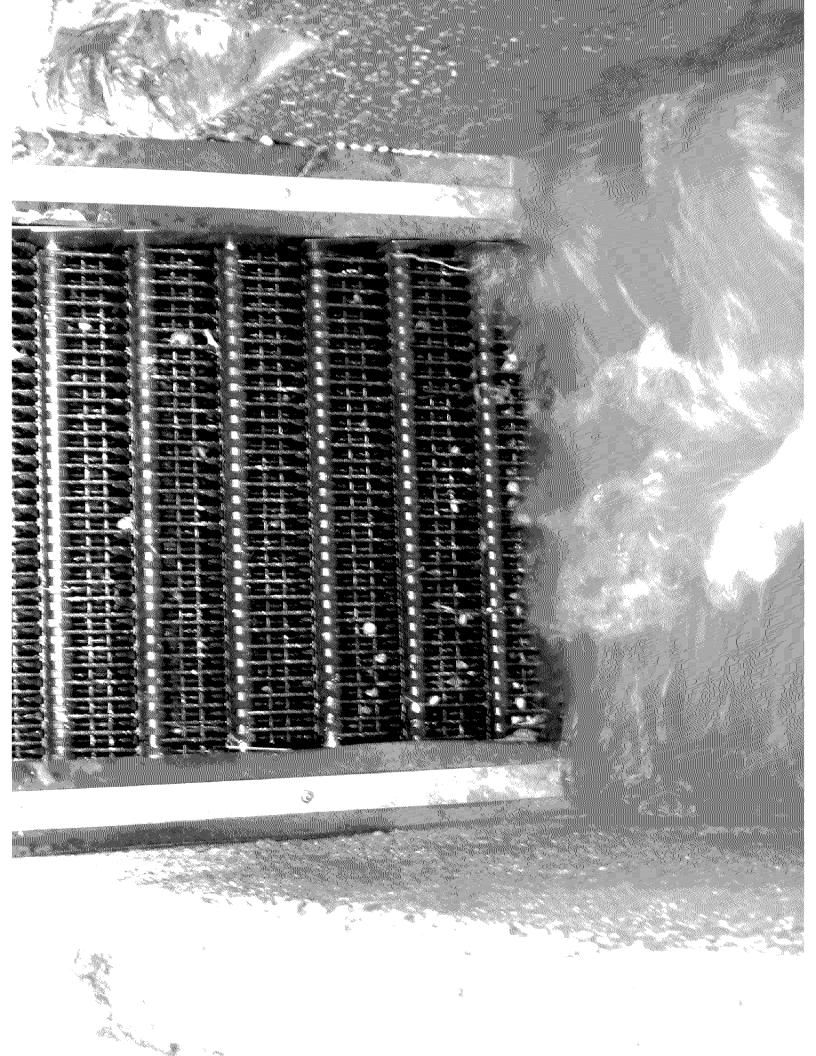
Description: Note one diffuser blowing across top of water instead of underwater.



Location:	88	97 Oak	Street in	Walnut Ridge, A	rkansas (Lawrence	County)		
Photograph	er:	Mike I	Kennedy		Witness:	Jonathan K	opp	
Photo #	3	Of	3		Date:	2-15-11	Time:	1144
Description	:	Note a	nother di	ffuser blowing ac	cross top of water.		•	
	oher:							







March 7, 2011

Mrs. Cindy Garner, Water Division Enforcement Branch Manager

5301 NorthShore Drive

North Little Rock AR 72118-5317

RE: Corrective action plan for Walnut Ridge Wastewater Plant and Lift Station inspection

Dear Mrs. Garner:

On February 15, 2011 Mike Kennedy performed the Wastewater Plant inspection as well as the wastewater collection system inspection. In accordance with the Federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, and the Regulations permitted there under. The inspection revealed the following violations:

- 1. Wastewater Plant:
 - Two Diffusers in Aeration Basin were not functioning properly
 - The motorized bar screen was inoperable
- 2. Frit Pump Station:
 - The vent fan was inoperative
 - No working lights in lift station
- 3. Poplar Street lift station:
 - Trash and equipment scattered on floor of lift station
 - No vent fan
- 4. Oak Street Pump Station
 - The window glass in the back of pump station is broken out
 - Vent fan not working
 - Water from vacuum pumps leaking onto floor

As a result of Mr. Kennedy's inspection the following action will be taken:

As of February 22, 2011 the bar screen and diffusers in basin have both already been repaired and are in perfect working condition. (pictures are included of bar screen)

The vent fans in lift stations have been ordered and will be installed as soon as they arrive from the factory.

The window in the Oak Street lift Station, trash on the floor of Poplar Street lift station, lighting in the Frit lift station, as well as the water from the vacuum pumps in Oak Street will be promptly attended to as soon as possible.

All violations are expected to be corrected with picture documentation before April 15th 2011.

If there are any questions or if I may be of any assistance please feel free to contact me at 501-454-4958 or 870-886-2312 or by email at jonathan.kopp@yahoo.com
Sincerely,
Jonathan Kopp City Water Works Wastewater Operator



June 28, 2011

Jon Kopp City of Walnut Ridge 216 Southwest 4th Street Walnut Ridge, AR 72476

RE: AFIN: 38-00040 NPDES Tracking No.: AR0046566

Dear Mr. Kopp:

The Department has received both of your responses to the February 15, 2011 inspection of your facility by our District Field Inspector, Mike Kennedy. Your letters appear to adequately address the discrepancies identified during the visit. The Department expects that the corrective actions taken will be maintained to ensure consistent compliance with the requirements of the permit. Acceptance of this response by the Department does not preclude any future enforcement action deemed necessary at this site or any other site.

The Department will keep the inspection and response on file. If future violations occur that require enforcement action, the Department will consider the inspection and response as required by the Pollution Control and Ecology Commission Regulation No. 7, Civil Penalties. This regulation requires the Department to consider the past history of your site and how expeditiously the violations were addressed in determining any civil penalty that may be necessary for any future violations.

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 501-682-0823 or you may e-mail me at suel@adeq.state.ar.us.

Sincerely,

Kevin Suel

Enforcement Analyst

L.W. 31

Water Division Enforcement Branch