

Waterford Utility LLC
PO Box 9299
Fayetteville, AR 72703
479-530-5926

July 23, 2015

Sandra Farmer
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118

Re: Permit Number 4815-WR-4 AFIN 60-00671
Permit Effluent Violations and Requested CAP

Thank you for taking the time to discuss with me your letter dated July 13, 2015 to Mr. Robert Holmes. As the operator of this facility, I am providing the answers to your requested CAP and associated effluent violations.

Your review revealed 23 effluent violations, 16 of these were due to missing information on past MMR's submitted to the ADEQ. I have included a copy of them with this letter along with the associated independent lab analysis reports. There were no permit excursions in July 2011 or July 2013.

Four (4) excursions were Ph levels below the permitted requirements. This was due to low flow in the facility when there were very few homes on the system. Low flow caused oxidizing out of alkalinity turning the system slightly acidic. Since the number of homes has increased on the system this problem has corrected itself because of a higher volume of wastewater entering the plant.

Regarding the 2 TSS and 1 Fecal Coliform excursion, MMR reports were submitted and the cause was explained in the comments section and is as follows:

February 2013 MMR

TSS Excursion: Suspended solids were elevated 3 mg/l due to sludge pump locking up in the clarifier. Pumps have been replaced and clarifier was cleaned out

July 2014 MMR

TSS Excursion: Lab said sample looked like it had dirt particles in it. Dirt which had become airborne was blown into the clarifier and mixed with the treated effluent.

December 2014 MMR

Clarifier was completely emptied one week prior to labs being pulled. High Fecal was attributed to this along with the higher than normal but within limits on TSS

Regarding reporting of Daily Max flow numbers, we will be reporting as will be defined in the pending permit to be issued for this facility.

If there is anything further you need, please contact me.

Sincerely,



Kathy Bartlett
Internal Operations Manager
Waterford Utility LLC