



A R K A N S A S
Department of Environmental Quality

September 29, 2016

Honorable Rhonda Halbrook
Mayor, City of Melbourne
P.O. Box 800
Melbourne, AR 72556

RE: NPDES Permit Number: AR0020036 AFIN: 33-00026
NPDES Permit Effluent Violations and Requested CAP

Dear Mayor Halbrook:

A review of the NPDES file for the above mentioned facility for the period of August 2013 through July 2016 reveals the following compliance issues:

The facility has reported **32 effluent violations** of Part I, Section A. of NPDES Permit No. AR0020036. 3 violations were attributed to Carbonaceous Biological Oxygen Demand, 12 violations were attributed to Total Suspended Solids, 8 violations were attributed to Fecal Coliform, and 9 violations were attributed to Total Residual Chlorine.

The Department is requesting that you consult with a Professional Engineer (PE), registered in the State of Arkansas, to obtain a certification from them stating you are in compliance with the effluent limitations of the Permit. If this cannot be obtained, please consult with a PE for the purpose of developing a Corrective Action Plan (CAP). The CAP should detail the corrective actions taken or that will be taken to achieve compliance with the terms of the Permit. The CAP should include a milestone schedule and the date the Facility expects to be in compliance.

Regarding the City's use of a relief manhole to discharge untreated sewage to a livestock pond, such manholes are prohibited in the State of Arkansas (Reg 6). The City installed this pipe to divert wastewater to a privately-owned pond when the collection system experiences I&I and the lift station downstream of the manhole cannot pump wastewater to the plant. The lift station does not have two operational pumps and/or there is need for constant repair. This is an unlined pond. It is not an EQ basin as it is not being used to equalize flow, and there is no way to remove the wastewater from the pond to route it to the plant. By doing so, the City is causing unpermitted discharges via the relief manhole to waters of the State. Additionally, it appears that no reporting of any sanitary sewer overflows or bypasses has been submitted to ADEQ in the last 2 years. Please address these issues in the CAP requested above. The CAP needs to be submitted to the Department by **October 28, 2016**.

The Department requests to meet with you, your operator and engineer to discuss the above issues and the corrective action the City intends to take to correct the above violations. Please contact me at 501-682-0636, or you may e-mail me at porterg@adeq.state.ar.us set a meeting time.

Sincerely,

Gina Porter
Enforcement Analyst
Water Division, Enforcement Branch