



NORTH LITTLE ROCK WASTEWATER UTILITY

June 21, 2017

Arkansas Department of Environmental Quality
Attn: Bailey Taylor-Water Division, Enforcement Branch
5301 Northshore Drive
North Little Rock, AR 72118

Email: taylor@adeq.state.ar.us

RE: NPDES Permit Number: AR0020303, AR0020320, AR0038288, and AR0033626

Dear Ms. Taylor,

We received the letter dated June 8, 2017 concerning the review of the NPDES file for the above mentioned facilities. Please see below the response to your findings.

1. In response to the 15 effluent violations, please consider the following:

AR0020303 (60-00274) CAO 10-218 – Faulkner Lake:

Both of the violations were related to a major flood event on the Arkansas River. A manhole on the 54-inch Riverside Interceptor was damaged and submerged during the flood event which allowed flood water to enter the system and impact the effluent TSS. Repairs have been made to the manhole.

AR0020320 (60-04317) CAO 10-218 – Five Mile Creek:

The Five Mile Creek STP is a lagoon system, and we believe the BOD5 results were influenced by nitrification within the test. Discussions are underway with ADEQ Permit Section staff considering modifications to the NPDES permit testing requirement changing from BOD5 to CBOD5. It should also be noted that the violation dated 05/31/2014 occurred during construction of plant modifications.

AR0038288 (60-04318) CAO 10-218 – White Oak Bayou:

The White Oak Bayou STP is a lagoon system, and we believe the BOD5 results were influenced by nitrification within the test. Discussions are underway with ADEQ Permit Section staff considering modifications to the NPDES permit testing requirement changing from BOD5 to CBOD5.

AR0033626 (60-00545) – Maumelle:

The violations dated 01/31/2017 are related to operational error. A MLSS concentration which was too low for this process during cold weather was maintained.

The violations dated 07/31/2016 are related to sample collection.

The violation dated 04/30/2014 occurred prior to North Little Rock Wastewater's purchase of the Maumelle Water Management facilities on 03/01/2016.

2. Please find enclosed the missing NCR from June of 2015.

3. Corrective Action Plan status report

a) Adopt Sewer Standards: Complete. Standard specifications approved by The North Little Rock Wastewater Treatment Committee are in effect, and an approved set is on file at the Arkansas Department of Health, Engineering Division.

b) Collection System Employee Training Program: Complete. Training for all sanitary sewer overflow (SSO) responders includes: response efforts; SSO field investigations; and reporting. All SSO reports are reviewed by the superintendent of collection systems, and all SSOs are followed up with progressive corrective actions.

c) Adopt Lift Station O&M procedures: Complete. All O&M procedures, schedules and preventative maintenance activities in Maumelle follow North Little Rock Wastewater's standard practices. O&M manuals are kept on file in the pump maintenance office at the Faulkner Lake Plant.

d) Lift Station Improvements: Complete. Staff conducted field inspections of the MWM lift stations prior to the March 1, 2016 consolidation date and found that both the Odom/Blue Mountain and River Run pump stations contained two pumps that were functioning normally. All pump stations are working properly at this time.

e) GIS: Complete. The Maumelle Water Management (MWM) service area collection system information was populated in the North Little Rock Wastewater GIS mapping system as of March 1, 2016. Changes and improvements are made based on the collection of GPS data and information from field staff conducting operation and maintenance activities.

f) CMMS: Complete. MWM records have been incorporated into NLRW's collection system maintenance management program to the extent possible.

We believe this satisfies North Little Rock Wastewater's responsibilities to fulfill the requirements originally agreed upon by Maumelle Water Management. We respectfully ask to be released from the Corrective Action Plan and to communicate future progress in our annual report.

It is always our goal to be compliant and to protect the waters of the state. If you have additional questions or need more information please call (501)945-7186.

Thank you,

A handwritten signature in black ink, appearing to read 'MEW', followed by a horizontal line.

Marc E. Wilkins, P.E.
Director
North Little Rock Wastewater

Enclosure



NORTH LITTLE ROCK WASTE WATER UTILITY

June 14, 2017 (Originally dated July 20, 2015)

Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317
Enforcement Division

RE: Non-compliance report for June Faulkner Lake Treatment Plant-AR0020303

The following is a description of the non-compliance for June 2015:

1. Description of the non-compliance:

- a) Exceeded weekly average TSS mg/l and monthly average TSS lbs./day

2. Duration of the non-compliance:

- a) 5 days

3. Cause of the non-compliance:

- a) The TSS mg/l and lbs. /day excursions were related to the high flows caused by the flooding of the Arkansas River. The event was declared a federal disaster and occurred from May 7th to June 15th of this year.

4. Measures to prevent or minimize the occurrence of the above non-compliance are:

- a) No further excursions are expected during normal operating conditions. We will continue with our sanitary sewer system evaluation surveys and rehabilitation of our entire collection system.

For further information, please call me at 501-945-7186.
NORTH LITTLE ROCK WASTE WATER UTILITY

Thank you,

Shannon Wayson, Chemist

CERTIFIED MAIL™

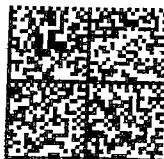
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