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June 19, 2019

Mr. Richard Healey
Enforcement Branch Manager
Arkansas Department of Environment Quality
5301 N. Shore Drive
North Little Rock, AR 72118

RE: Adams Field Water Reclamation Facility
Emergency Operating Procedures
NPDES Permit No. AR0021806 AFIN: 60-00409

Dear Mr. Healey:

Over the past few weeks, the City of Little Rock experienced major flooding due to the rise and crest of the Arkansas River. The river crested at 29.71ft. bringing the river elevation to 253.32 ft, well over the established 100 Yr Flood Elevation and beyond the design and performance standards for the Adams Field Water Reclamation Facility. Prior to and throughout this elevated river stage, waters from the Arkansas River were migrating into the effluent chambers of the treatment process, bringing with it various aquatic inhabitants including catfish.

In reference to our NPDES Permit, Part III.B.4.C.1(a), the Ultraviolet Disinfection System had to be taken out of service and raised out of the river backwater to avoid a catastrophic loss of equipment. On June 1st, the level in the UV effluent channel reached 250.69' which is the maximum operating level for the UV System. Adams Field switched to Peracetic Acid (PAA), which is being tested on-site under the supplement disinfection study, as a means of providing disinfection while the UV System was off. At 7:37 AM on June 9th, the river backwater conditions had receded allowing the UV System to be brought back online and the PAA System was shutdown.

The major flooding, and ensuing natural disaster, from the Arkansas River caused collection system inundation as well as effluent backwater conditions. These historic conditions resulted in significant process upset and threatened potential property damage and personal injury of the Adams Field Facilities and LRWRA staff. However, under the required guidelines of the Peracetic Acid Supplemental Disinfection Study, an effort was made to continue proper sampling protocol while PAA was in use, and this data will be included in the PAA updated report.

Should you have any questions concerning this notification, please give me a call at 501-688-1429 or by e-mail at walter.collins@lrwra.com.

Sincerely,

LITTLE ROCK WATER RECLAMATION AUTHORITY

A handwritten signature in black ink, appearing to read 'Walter B. Collins', with a large, sweeping flourish at the end.

Walter B. Collins, P.E.
Director of Operations and Facilities

Cc: Greg Ramon, CEO
Howell Anderson, P.E., COO
Jamie Ewing, Director of Environmental Assessment Department
Jean Block, Chief Legal Officer

LRWRA Operations Division Receipt of Hand Delivered Mail

Date: June 19, 2019

To: Arkansas Department of Environmental Quality
Richard Healey
Enforcement Branch Manager

From: Walter B. Collins, P.E.
Director of Operations and Facilities

Regarding: Adams Field Wastewater Treatment Plant
Emergency Operating Procedures
NPDES Permit No. AR0021806 AFIN: 60-00409

On behalf of the Arkansas Department of Environmental Quality (ADEQ), I hereby acknowledge receipt of the letter dated June 19, 2019 from Walter Collins of Little Rock Wastewater addressed to ADEQ, Richard Healey, Enforcement Branch Manager.

Accepted By: _____
 Picked Up By: Arkansas Department of Environmental Quality

Date

Delivered By: Walter B. Collins
 Picked Up By: Little Rock Water Reclamation Authority

6/21/19
Date

RECEIVED
JUN 21 2019
Agm 11:50 am