



January 29, 2021

Richard Healey, Enforcement Branch  
Arkansas Department of Energy and Environment  
Division of Environmental Quality  
Office of Water Quality  
5301 Northshore Drive  
North Little Rock, AR 72118

RE: Little Rock Water Reclamation Authority – Adams Field Water Reclamation Facility  
NPDES Permit No. AR0021806  
Progress Report No. 3, CBOD5 and NH3-N final seasonal effluent limits

Dear Mr. Healey:

Please accept this letter and accompanying attachments as Progress Report #3 regarding compliance with Final Effluent Limitations for CBOD5 and NH3-N in NPDES Permit No. AR0021806 (per Part IB of the permit). As stated in Progress Report #2, substantial construction at the Adams Field Water Reclamation Facility remained for 2020 but LRWRA anticipated that construction would be completed in the final quarter of 2020 and that we would be able to certify that the final limits were met on January 1, 2021.

Unfortunately, excessive rainfall, a lack of progress by the Contractor and the COVID-19 pandemic impacted the construction schedule that we submitted in the second progress report. Because these final limits are seasonal limits, we cannot certify that we will be in full compliance when the NH3-N limits apply in May 2021. We are confident that we will meet the CBOD5 final limits when those seasonal limits are effective in May. Thus, we propose to continue with quarterly progress reports to keep you updated on the construction and anticipated date of full compliance. We would submit the next progress report to you no later than April 1, 2021.

As you may recall, this project involves two distinct facets. The first is to add parallel treatment for wet weather flows. The second included necessary modification to the aeration basins, secondary clarifiers, and other treatment processes to achieve ammonia reductions. The construction sequence of these modifications will determine the duration of the project. Several process additions remaining fall on the critical path to meeting the ammonia limits.

We continue to work alongside the contractor to expedite the completion of this construction project through the many challenges including the pandemic. The current construction completion date indicated in the contractor's latest schedule is at the end of the second quarter of

2021. Further updates on the construction sequence will be available in our next progress report submittal.

Thank you for your consideration of this progress report. We are available to discuss this report and the current status of the project at your convenience. If you have any questions or would like to schedule a meeting to discuss, you may contact me or Walter Collins, Director of Operations and Facilities, at (501) 688-1429.

Sincerely,  
LITTLE ROCK WATER RECLAMATION AUTHORITY



Jamie Ewing,  
Director, Environmental Assessment

Cc: Bryan Leamons, Permits Branch, Office of Water Quality  
Greg Ramon, Chief Executive Officer, LRWRA  
Howell Anderson, Chief Operations Officer, LRWRA  
Jean Block, Chief Legal Officer, LRWRA  
John Holloway, Director of Engineering, LRWRA  
Walter Collins, Director of Operations and Facilities, LRWRA