



September 19, 2012

Cheryl White, Property Manager  
Three Financial Centre  
425 W Capitol Avenue  
Little Rock, AR 72201

Subject: Diversion Meter Approval and Reporting

Dear Ms. White:

Little Rock Wastewater (LRW) has reviewed the information required to be eligible to receive a wastewater diversion meter credit, conducted an on-site inspection, and obtained the initial meter reading from the diversion meter located at Three Financial Centre, 900 S Shackleford Road. Three Financial Centre has been approved to be included in the Diversion Meter Credit Program as long as Three Financial Centre adheres to the following Program requirements.

The diversion water usage and credit you are approved for is for water used in the Cooling Tower System. Three Financial Centre has advised LRW that most of the water used in the system is evaporated to atmosphere. Based upon the inspection conducted by LRW on September 17, 2012 it was determined that the cooling tower basin drains are connected to the storm water drainage and conveyance system, and are not connected to the sanitary sewerage system. By copy of this letter, LRW is advising Three Financial Centre this direct discharge to the environment is most probably a violation of the City of Little Rock's Stormwater Ordinance 19,497 and the Federal Clean Water Act. LRW is providing a copy of this letter to the Little Rock Public Works Department and the Arkansas Department of Environmental Quality, both of whom have jurisdiction over matters related to the control of dischargers into the storm water systems within the City and State.

The diversion meter and location meet LRW's approval and Three Financial Centre may now receive a diversion credit for this water. The meter reading obtained by LRW on the date of inspection is on the enclosed Diversion Credit Report Form. You must use this meter reading as the "previous meter reading" on LRW's Diversion Credit Report Form and fill in the October 1<sup>st</sup> reading for the "present meter reading" for your first report.

Please be sure to keep a copy of each report for your files. I have listed below the items that must be followed to report meter readings for diversion credits.

1. All new meters must measure in cubic feet or multiples of cubic feet.
2. All customers receiving diversion credits should read the meters as close as possible to the first working day of each month.
3. All diversion meter credit reports must be received by LRW by the tenth (10th) day of each month to ensure that a credit will be issued. The reports are to be sent to the following address:

Little Rock Wastewater  
Finance and Administration Department  
Attention: Accounts Receivable  
PO Box 45090  
Little Rock, AR 72214  
Fax: 501-688-1409  
Email: Diversion.Credits@lrwu.com

4. Customers must use the report form furnished by LRW. Be sure to circle the correct unit of measure for your meter on the report form, i.e., gallons or cu-ft.
5. To ensure accuracy of readings and credits, meter readings must include all digits even if they are zeros. For example, if the meter has spaces for six (6) digits, the reading should be 006531 and not 6531.
6. The meter must be maintained and routinely calibrated to assure an accuracy of  $\pm 10\%$ .
7. If you are reporting meter readings for more than one building, please record the building name, location, and account number in the space provided for meter location.
8. Customers with cooling towers and boilers used for conditioning the air space of buildings or used by industrial facilities for processing will only receive credit for 70% of their reported diverted flow. For more detail please reference City of Little Rock Ordinance No. 20,594 or its successor ordinance.
9. No refunds, allowances, credits, or deductions from the 100% water use base will be granted to a non-domestic customer for any time period prior to approval of a sewage metering or diverted water metering system.
10. For customers failing to meet the reporting deadline the following conditions apply:
  - After receiving approval for a meter installation, and should that metering system fail, or the customer fail to report monthly readings for ninety (90) days, the non-domestic customer shall have ninety (90) days to effect repairs or replace the defective meters, and/or resume submittal of monthly meter readings. After ninety (90) days of either occurrence, LRW shall apply 100% of the total water metered volume as if it was all discharged to the sewerage system for the purpose of preparing the monthly bill.

The Little Rock Sanitary Sewer Committee adopts Consolidated Fee Schedules each year. The fees for the Diversion Credit Program are adjusted to cover Little Rock Wastewater's cost for administering the Diversion Credit Program. These fees are adjusted annually and are subject to change. The fees which began on January 1, 2012 are as follow:

**3.8 Diversion and Sewer Meter Inspection Fees**

|   |          |
|---|----------|
| 3.8.1 New Meter Installation - Review, On-Site Inspection, and Approval .....   | \$238.00 |
| 3.8.2 Annual Inspection (each meter and meter type) .....                       | \$125.00 |
| 3.8.3 Replacement Meter Installation Fee (Active Account Only) .....            | \$128.00 |
| 3.8.4 Meter Re-Activation Fee (Applies to Lapsed Accounts $\geq$ 90 days) ..... | \$238.00 |

One final item that requires your attention is the installation of new meters and changing out defective meters. All new meter installations and/or change outs must be approved by LRW and the appropriate fees paid before the work has begun.

Your cooperation in this matter is greatly appreciated. Prompt, accurate reporting of diversion meter readings will ensure that participants will receive the appropriate sewer credit. If you have any questions concerning this letter call me at 688-1493.

Sincerely,

LITTLE ROCK WASTEWATER



Tony Roll, Industrial Inspector  
Environmental Assessment Division

Enclosure

cc: BJ Harrison, Accounting Supervisor Operation and Maintenance  
Stanley Suel, Director, Environmental Assessment Division  
Accounts Receivable  
Three Financial Centre Diversion Meter Correspondence File  
ADEQ, NPDES Enforcement Section, Water Division  
Mr. Nathan Charles, P.E., Environmental Compliance Engineer, Public Works Department

NPDES Enforcement Section, Water Division  
Arkansas Department of Environmental Quality  
5301 Northshore Drive  
North Little Rock, AR 72118

Mr. Nathan Charles, P.E.  
Environmental Compliance Engineer  
Little Rock Public Works Department  
701 West Markham St.  
Little Rock, AR 72201  
E-Mail: ncharles@littlerock.org  
Business Phone: (501) 371-4475



# Little Rock Wastewater

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Little Rock, Arkansas 72204



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MAILED FROM ZIP CODE 72202

**NPDES Enforcement Section, Water Division**  
Arkansas Department of Environmental Quality  
5301 Northshore Drive  
North Little Rock, AR 72118



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