



February 21, 2018

**Certified Mail: 9489 0090 0027 6022 2381 37**

Todd Pedersen, General Manager  
West Memphis Utilities  
P.O. Box 1868  
West Memphis, AR 72301

**Email: tpedersen@citywm.com**

RE: NPDES Permit Number AR0022039, AFIN 18-00879  
Request for Corrective Action Plan

Dear Mr. Pedersen,

The Department appreciates you and your staff for taking the time to meet with the Department on February 21, 2018. As was discussed, in preparation for the renewal for the above reference permit, a review of the NPDES file for the above mentioned facility for the period of January 1, 2014 through December 31, 2017 reveals the following compliance issues:

- West Memphis Utilities reported three (3) bypasses totaling more than 70 million gallons of partially or untreated wastewater from an unpermitted outfall. These wastewater discharges resulted from bypasses of the treatment system into receiving waters. Each of the three (3) bypasses constitutes an unpermitted discharge that violates Ark. Code Ann. § 8-4-217(a)(3).
- West Memphis Utilities has reported one hundred and seven (107) SSOs totaling more than 84,000 gallons. Each of the one hundred and seven (107) SSOs constitutes an unpermitted discharge that violates Part II Condition 5 of the Permit and Ark. Code Ann. § 8-4-217(a)(3).

ADEQ requests West Memphis Utilities submit a Corrective Action Plan (CAP) **within sixty (60) calendar days of the receipt of this letter**, to address the violations cited above. The CAP shall be certified by a Professional Engineer (PE) licensed in the state of Arkansas and, at a minimum, shall include the following information:

- A plan to conduct a complete evaluation of the wastewater treatment plant to ensure the plant is capable of handling the stormwater and wastewater capacity;
- A Plan to evaluate sanitary sewer collection system with the overall goal of eliminating capacity and non-capacity related SSOs;

- A plan to identify areas requiring improvements and to prioritize those improvements;
- A milestone schedule outlining expected completion dates for the actions in the CAP and a reasonable expected date of final compliance.

Should you have any questions, feel free to call me at 501-682-0056 or at [david.miller@adeq.state.ar.us](mailto:david.miller@adeq.state.ar.us)

Sincerely,



Dave Miller  
Enforcement Analyst  
Office of Water Quality