

April 27, 2020

Honorable Marco McClendon, Mayor
City of West Memphis, West Memphis Utilities Commission
P.O. Box 1868
West Memphis, AR 72301

**RE: NPDES Permit Number: AR0022039, AFIN: 18-00879
CAO LIS 20-134 Deliverables Response**

Dear Mayor McClendon,

The Division received and reviewed the Wastewater Treatment Facility Treatment and Hydraulic Expansion Study dated April 2020, the Revised Corrective Action Plan (CAP) dated April 24, 2020, and the justification for selected design storm event dated April 2, 2020 for the above referenced facility. The Revised CAP was deemed adequate. Please see the following comments:

- Please contact the Arkansas Department of Health (ADH) for approval of their collection system rehabilitation/repair project. Once approved, please submit the letter of approval to DEQ.
- Please be advised that a state construction permit is required for the WWTP upgrade. Please submit the construction permit application by **May 27, 2020**.
- If a construction site will disturb greater than or equal to one (1) acre and less than five (5) acres, the permittee shall comply with the requirements in APC&EC Rule No. 6.203 for Stormwater discharge associated with a small construction site, as defined in APC&EC Rule No. 6. If the construction site will disturb five (5) acres or more, the permittee shall comply with the terms of the Stormwater Construction General Permit Number ARR150000 prior to the start of construction. BMPs must be implemented regardless of the size. If the Stormwater Construction General Permit is needed, please submit the application by **May 27, 2020**.
- NPDES individual permit modification will be required as well for the facility upgrade. The permit modification fee will be \$5,000.00 based on Rule No. 9.403(B)(2). Please submit a permit modification application by **May 27, 2020**.

Thank you for your attention to this matter. Should you have any questions, feel free to contact me at 501-682-0056 or you may e-mail me at danielle.harbin@adeq.state.ar.us.

Sincerely,

A handwritten signature in cursive script that reads "Danielle Harbin".

Danielle Harbin
Enforcement Analyst
Office of Water Quality

cc: Todd Pedersen, General Manager, tpedersen@citywm.com
Tim Verner, P.E., Fisher and Arnold, tverner@fisherarnold.com