

Lawrence, Myrl

From: Lawrence, Myrl
Sent: Wednesday, February 13, 2019 12:32 PM
To: 'mayorsanders@sbcglobal.net'; 'BWingfield@pmico.com'; 'gcarrblyww@gmail.com'
Cc: Healey, Richard; Johnson, Miles; Liu, Terry; Walker, Brent; Bolenbaugh, Jason
Subject: Response to Blytheville CAP submission



February 12, 2019

Honorable James Sanders
Mayor, City of Blytheville
P.O. Box 1784
Blytheville, AR 72316

Email: mayorsanders@sbcglobal.net

Re: NPDES Permit Numbers AR0022578, AR0022560, and AR0022586
Response to Submitted Corrective Action Plan

Dear Mayor Sanders:

The Corrective Action Plan submitted on January 3, 2019 has been reviewed and the following comments are made:

1. Plant design, construction plan, and specifications must be submitted to the Department for review and approval before any construction activities start.
2. During interim operation, the discharge must be in compliance with the permit limits.
3. The pipe line from West Plant to South Plant may require a construction stormwater permit ARR150000 if it will disturb in excess of one acre.
4. Any changes to the permittee's disposal practices described in the permit will require at least 180 days prior notice to the Director to allow time for additional permitting.
5. The final compliance date would be September 30, 2021.

The additional stipulations are made:

1. The Interim Operating Plan section is inadequate. Details should be provided on specific operating measures, staffing, methods to handle flow when diversion of flow may be required due to maintenance or construction, specific disinfection steps and procedures being taken to address effluent violations in the interim to ensure permit limit compliance prior to discharge, and any other special actions that may be expected or necessary during the interim operation of the facility. Each facility should be addressed individually in this section as each facility has unique operating needs.
2. The Sanitary Sewer Evaluation Study update is inadequate. Specific details of the areas of concern, prioritization of work, updated mapping, etc. should be provided.

The Proposed Upgrades, Summary of Recommendations, and Milestone Schedule are adequate. The Interim Operating Plan and Sanitary Sewer Evaluation Study are inadequate and the issues identified above should be addressed and submitted to ADEQ **no later than February 28, 2019**.

Your attention to this matter is most appreciated. Should you have questions or desire assistance please contact me directly.

Sincerely,



Myrl V Lawrence Jr
Enforcement Analyst
ADEQ Office of Water Quality
Phone: 501-682-0699

Cc: Brad Wingfield, P.E., PMI, BWingfield@pmico.com
Gary Carr, City of Blytheville, gcarrblyww@gmail.com

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY
5301 NORTSHORE DRIVE / NORTH LITTLE ROCK / ARKANSAS 72118-5317
TELEPHONE 501-682-0744 / FAX 501-682-0880 / www.adeg.state.ar.us