



February 5, 2019

CERTIFIED MAIL 9489 0090 0027 6060 6311 05

Honorable Jay Hollowell
Mayor, City of Helena-Helena Municipal Water and Sewer
P.O. Box 248
Helena, AR 72342

RE: NPDES Permit Number AR0043389 AFIN: 54-00083
Request for a Corrective Action Plan

Dear Mayor Hollowell,

ADEQ has conducted a review of the certified Discharge Monitoring Reports (DMRs) submitted by the facility from January 1, 2016, through December 31, 2018. The review revealed that six (6) violations of the permitted effluent limits have been reported. A detailed list of the violations is included with this letter. As a result of this review, ADEQ requests that the City of Helena submit the following documentation to the ADEQ Office of Water Quality, Enforcement Branch:

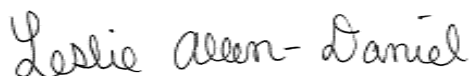
- A Corrective Action Plan (CAP). The CAP shall be certified by a Professional Engineer (PE) licensed in the state of Arkansas and at a minimum, the CAP shall include the following information:
 - o The cause(s) of the effluent violation(s).
 - o Evaluation of the current permitted treatment system for compliance within the requirements of your permit.
 - o The actions to be taken to correct, and prevent, the recurrence of the effluent violations.
 - o A milestone schedule for compliance with the permit effluent limits, with a final date of compliance.

The CAP should be submitted to the Department no later than **March 5, 2019**. The document may also be emailed to me at allen-daniel@adeq.state.ar.us. Please make sure you also sign the CAP along with the engineer. If an extension is needed, please submit documentation in writing with the reason and amount of time needed, before the **March 5, 2019**, due date.

Any violation of your NPDES Permit is subject to enforcement action by this Department, pursuant to the Arkansas Water and Air Pollution Control Act, which may include the assessment of a civil penalty. The regulations and your NPDES Permit require that you take all reasonable measures necessary to eliminate or prevent the occurrence of violations.

Thank you for your attention to this matter. Should you have any questions, or would like to schedule a meeting, feel free to contact me at 501-682-0630 or at allen-daniel@adeq.state.ar.us.

Sincerely,

A handwritten signature in cursive script that reads "Leslie Allen-Daniel".

Leslie Allen-Daniel
Enforcement Analyst
Office of Water Quality, Enforcement Branch

Effluent Violations

City of Helena

AR0043389

DMR End Date	Discharge Number	Parameter Description	DMR Value Qualifier Code	Reported DMR Value	Permit Limit	Vio %
07/31/2016	001-A	Coliform, fecal general (7 DA GEO, #/100mL)	=	420	400	5%
05/31/2017	001-A	Coliform, fecal general (30DA GEO, #/100mL)	=	231	200	16%
05/31/2017	001-A	Coliform, fecal general (7 DA GEO, #/100mL)	=	466.7	400	17%
06/30/2017	001-A	Coliform, fecal general (7 DA GEO, #/100mL)	=	519	400	30%
06/30/2018	001-A	Oxygen, dissolved [DO] (INST MIN, mg/L)	=	1.7	2	15%
09/30/2018	001-A	Coliform, fecal general (7 DA GEO, #/100mL)	=	1565	400	291%