

Recertification Notice of Intent (NOI)

Regulated Small Municipal Separate Storm Sewer Systems (MS4's) General Permit ARR040000

You must complete, certify, and sign this Recertification Notice of Intent (NOI) form and return it along with the updated Stormwater Management Program (SWMP) to the Department in order to continue permit coverage under the General Permit ARR040000. You must submit this form **no later than July 1, 2019**. Please keep a copy of this form for your records once completed and signed.

Permittee Name	Permit Tracking Number	AFIN
City of West Memphis	ARR040025	88-00852

If any changes or additions need to be made to the information shown below, please update the new information in the corrections section below and/or attach documentation.

	Current Information in ADEQ's database	Corrections/Additions, If Needed
Small MS4 Physical Address	205 S. Redding	
County	Crittenden	
Urbanized/Core Areas	West Memphis Urbanized or Core Area	
Receiving Stream	10 Mile Bayou	
Ultimate Receiving Stream	Mississippi River	
Contact Person & Title	William H. Johnson, Public Works Administrator	Amanda Hicks, Public Works Director
Telephone Number	(870) 732-7671	
Cognizant Official & Title	William H. Johnson, Mayor	Marco McClendon, Mayor
Responsible Official & Title	William H. Johnson, Mayor	Marco McClendon, Mayor

Are the mailing and invoice addresses the same?

Yes or No*

*If "No," please provide invoice address:

Additional Comments: _____

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

I certify that I have read and will comply with all the requirements of the Regulated Small Municipal Separate Storm Sewer Systems (MS4's) General Permit ARR040000.

Responsible Official Name: Marco M. Clendon
 Responsible Official Title: Mayor
 Responsible Official Signature: Marco M. Clendon
 Date: 5/31/19

Return the NOI form to the address below or send it electronically to: water.permit.application@adeq.state.ar.us or via ePortal at the following web address: <https://eportal.adeq.state.ar.us/>

NPDES Permits Section, Office of Water Quality
 Arkansas Department of Environmental Quality
 5301 Northshore Drive
 North Little Rock, AR 72118-5317



06/02/2019

Terry Liu, P.E.
ADEQ-Office of Water Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317

Subject: Updated SWMP for the City of West Memphis, Including TMDL's

Dear Mr. Liu,

I have provided you with a copy of the updated SWMP, including the Total Maximum Daily Loading section. Please advise if you find anything needs to be changed.

Sincerely,

Amanda Hicks
City Engineer & Public Works Director
City of West Memphis
205 S. Redding
West Memphis, AR 72303
(870)-702-5109 (O)
(870)-636-5411 (C)
(870)-732-7650 (F)



WEST MEMPHIS STORMWATER MANAGEMENT PROGRAM IMPLEMENTED THROUGH THE SIX MINIMUM CONTROL MEASURES AS PER MUNICIPAL SEPARATE STORM SYSTEM (MS4) PERMIT (ARR040025)

May 21, 2019

This Plan contains the efforts of the City's prior 5 Year Program outlined in the City's MS4 permit. The City has implemented the six minimum control measures:

- Public Education and Outreach on Stormwater Impacts
- Public Involvement and Participation
- Illicit Discharge Detection and Elimination
- Construction Site Runoff Control
- Post-Construction Stormwater Management in New Development and Redevelopment
- Pollution Prevention/Good Housekeeping for Municipal Operations
- Total Maximum Daily Loads (TMDL's) and BMP's to Address

The City advertised in the local newspaper, on social media and via the City's website, a public meeting to join the City's Storm Water Stakeholder's Committee. The City's Storm Water Stakeholder's Committee, which include the City Engineer/Public Works Director, The Public Works Committee (includes 5 City Council Members), Code Enforcement Officer, Community Development Director, and the Street & Drainage Superintendent and any developers, homebuilders, or citizens interested in a cleaner environment have evaluated the existing Stormwater Program and are proposing additional measures to correct and maintain the stormwater drainage in the City of West Memphis for the next 5 years.

NOTE: "Plan" indicates the City's original proposed action as included in its MS4 Permit to meet the intent of the indicated EPA's MS4 Minimum Control Measures, Measurable Results & Future Goals, Accomplishments, and Method of Measurement are intended to describe the City's development path to the current SWMP including actions and accomplishments toward meeting a reduction in stormwater pollutants to the maximum extent practicable to protect water quality.

1. Public Education and Outreach on Stormwater Impacts

Decision Process: The City's Storm Water Stakeholder's Committee has evaluated the Public Education and Outreach on Stormwater Impacts Program and has added additional measures to strengthen and expand our efforts.



Rationale: The City's purpose is to reach all facets of the public including target entities such as industrial, commercial and land development to educate and encourage their participation in the City's effort to protect water quality. These efforts will include the following measurable goals:

A. Social Media has made a major impact in the world's efforts to communicate information of all kinds to different groups of people at once. The City currently uses the following social media sites to convey information and gather measurable data about littering, proper disposal of potential stormwater pollutants and how to maintain personal property during a major stormwater event:

1. Facebook: <https://www.facebook.com/thecityofwestmemphis/>
Measurable Results: 5,329 followers
2. Instagram:
https://instagram.com/cityofwestmemphis?utm_source=ig_profile_share&igshid=1efdxtkhd1xw
Measurable Results: 2,518 followers
3. YouTube: <https://www.youtube.com/channel/UC12EBnZJD7WM1ft4jxzVklG>
Measurable Results: 8,124 views & 104 subscribers
4. Twitter: @cityofwestmemphis
Measurable Results: 129 Followers

Topics will vary from day-to-day, but a few educational themes will include:

- For commercial businesses that collect wastewater, such as carpet cleaners, pressure washing, painting and janitorial services, how to properly dispose of the wastewater and what effect it would have on local waters if these businesses dumped the water directly into the stormwater drainage system.
- How maintaining a garden can cause pollutants to enter receiving waters by use of fertilizers and pesticides and how to organically grow a garden.

B. Insert a flyer in the utility's monthly mailing once a year about what effect littering has on stormwater pollution. This outreach program will ensure the City is reaching its target audiences (residents and commercial businesses) with measurable results, using best management practices.

1. Measurable Results:
 - a. Residential: 10,228
 - b. Commercial/Industrial: 1,525



- c. Construction (temporary): 125
- C. Send restaurants, service garages, car washes, and heavy industrial businesses information packs on how to properly dispose of any material that could possibly lead to an illicit discharge. This can range from cooking grease, to motor oils to solvents found in car washing soap. Using this method, the City can obtain measurable results, as stated below:

Measurable Results:

Restaurants: 57

Vehicle Garages: 43

Car Washes: 10

- D. Updating the City's website. Currently, the City of West Memphis is debuting its new website in July 2019 from http://www.westmemphisutilities.com/street_dept.htm to www.westmemphisar.gov also the city supports <http://www.keeparkansasbeautiful.com/faq/>. On this website, the City will have the capability to see how many views the site receives and will also have the capability to change bulletins and updates the City may need to make public. Using the current website http://www.westmemphisutilities.com/street_dept.htm, the City will update the website with varying themes that can give residents information on how they can conserve local waters from pollution. There will also be technical specifications for contractors and land developers. Within these specifications, details on how to effectively maintain erosion and drainage control on work sites. There will also be a blank inspection evaluation form for contractors to see how the city evaluates worksites.

1. Measurable Results: ____ Views Per Day (Will update once operational)

2. Public Involvement/Participation

Decision Process: The City's Storm Water Stakeholder's Committee has evaluated the public involvement/participation process on Storm Water impacts and added additional measures to strengthen and expand our efforts. The target audiences include citizens, contractors and industries working together in efforts to reduce stormwater runoff pollution in the City.

Rationale: The City has sought the public's input on the development of the existing Storm Water Management Program and this update for the proposed next 5-year



program. We have used the City's best management practices for public participation through social media, an insert in the monthly utility bill once a year and updating the city's website.

The City will continue to encourage public involvement and participation in its efforts towards stormwater management program including the following measurable goals:

- A.** Hold a public meeting to discuss the NOI (Notice of Intent), what exactly our five (5) year plan for the SWMP (Storm Water Management Plan), and ways to decrease stormwater pollution with residential, commercial, and construction facilities. The public meeting will be published in the newspaper, via Facebook, Twitter, Instagram and YouTube at least two weeks before the event occurs. There will be a sign-in sheet before entering the meeting, to obtain a measurable result.
- B.** Hold community clean ups. This activity has been going on for over a decade in the City and is funded through The Great Arkansas Clean-Up and Keep Arkansas Beautiful Commission. Once every Spring and Fall, the City of West Memphis through the organization of Councilperson Robinson, has a volunteer program to beautify the City of West Memphis. Information for events is posted to social media and the City's webpage, along with links to the event's site: <http://www.KeepArkansasBeautiful.com/faq/>. When participants show up at the event, each participant is asked to sign-in and provide a phone number, this is how this event can prove measurable results for the City's efforts. They also receive a pair of gloves, bags, and t-shirt with the Beautify West Memphis logo. This effort ensures that litter and debris will not enter streams and ditches, polluting the public surface water.

Fall 2018 Volunteer Results: 52 volunteers

- C.** Elementary and Highschool involvement is another type of Public Involvement/Participation effort the City will provide. Having an art contest for schools and allowing the winner's art to be presented on the pamphlet that is used as an insert into the monthly utility bills. The theme will be, "Keeping our streams clean". The measurable results will not only come from the participation, but also the number of flyers circulated throughout the city.
- D.** The department responsible for all Public Involvement/Participation is the Public Works Department and the person responsible for coordinating all Public Involvement/Participation is the City Engineer, Planning & Development Director, and Public Works Administrative Assistant.



3. Illicit Discharge Detection and Elimination

Decision Process: The City's Storm Water Stakeholders Committee has evaluated and plans to implement and enforce a program to detect and eliminate illicit discharges from entering water sources and to also identify which sources of discharges are not considered illicit. The City plans to prohibit the illicit discharges by way of a City Ordinance within the five years of this program by prohibiting any individual non-stormwater discharge that is determined to be contributing a significant amount of pollutants to the MS4. See attached ordinance.

Rationale: The City's goal is to become proactive as opposed to reactive when auditing discharge points during dry weather periods, and industrial, commercial and construction sites if identified as significant contributors of pollutants. The illicit detection program will include regular yearly outfall inspections on the City's main collector for all storm water, the 10-Mile Bayou, as shown on the attached map. The maps that are attached were put together in 2009 and are in the process of being updated to include not only the main bayou, but also any other drainage structure, including closed and open drainage. Along with the maps, are inspection sheets that outline the inspection process for each outfall point. Dry weather field screening to identify for non-stormwater flows will be completed as weather permits. If a non-stormwater flow is identified, the City Engineer along with the Public Works Director will be responsible for sending a sample to an environmental lab for testing.

To ensure appropriate enforcement procedures, the Public Works department will work closely with Code Enforcement to ensure that illicit discharges are eliminated over the next five years. If an illicit discharge is detected, Public Works, along with the City Engineer and Code Enforcement will begin to identify the source by using the maps that will be updated. The possible source (homeowner, commercial business owner, or construction company) will be notified. Then, the spill will be documented along with pictures and procedures and steps to clean the incident. Code Enforcement will issue any citation that will comply with the ordinance to eliminate illicit discharges. After each trace sourcing for illicit discharges are complete, the program will be evaluated for successful completion using best management practices.

If an illicit discharge is identified, the City will use social media, along with updates on the City's website to inform the public of the discharge and what to do if any of the



public suspects a non-stormwater pollution source. Also, the dangers in cleaning any non-stormwater pollution source. These BMPs can be measured by the number of followers, likes, comments, subscribers and views per day, depending on the public outreach mechanism.

The ordinance will include the boundaries for stormwater illicit discharge detection and elimination program that includes dry-weather screening of all outfalls located in the City's MS4's urbanized area at the time of the permit coverage over the next five years. Outfalls draining into undeveloped watersheds do not need to be screened for illicit discharges. The stormwater system map will be updated annually as needed for changes occurring in the urbanized area boundaries.

The annual report shall include the following:

- Number of dry-weather outfalls (known)
- Number of dry-weather flows identified
- Number of illicit discharges identified
- Number of illicit discharges eliminated
- Schedule for elimination of illicit connections
- Summary of any stormwater system mapping updates

4. Construction Site Stormwater Runoff Control

Decision Process: Currently, when construction plans are submitted for review and approval, a grading plan must be included. The grading plan must ensure that no water will be trapped behind houses and all yards drain properly. Unless an already established drainage exists, backyard drainage, with or without easements, will not be permitted. The City Engineer is responsible for determining what is and what is not an established drainage system. Other departments responsible for the plan approval process are: Planning Commission, Utility Department, and the Fire Department. Each Department is responsible for reviewing any new or improvement construction plans and either approving or advising developer/contractor/engineer steps they need to take in order to comply with each department's codes and/or ordinances.

The subdivision approval process includes construction and post construction measures for stormwater management in new subdivisions. Each new subdivision plan that is submitted to the Planning Commission must have approved grading plans and



appropriate erosion sedimentation measures including stormwater detention requirements. Post construction “as-built” are required from owner’s engineer.

The planning department is responsible for issuing building permits after the approval of the City Engineer for streets, grading and drainage including erosion control; the Floodplain Administrator in relation to floor elevations and flood certificates in compliance with our floodplain ordinance. The utility department is responsible for approving various utilities, electrical, sanitary sewer and potable water easements and improvements. The Fire Department reviews plans for fire safety, and inspections are done by the Fire Department Inspectors to ensure these requirements are met. The City employs two full-time building inspectors, who perform on-site inspections; in addition to the Building Inspectors, a uniformed Code Enforcement Police Officer is on staff and authorized to write citations to violators who fail to comply with the inspectors’ instruction or to issue “stop work” orders.

In the event the inspectors do encounter run-off or BMP problems on construction site, and are unable to mediate the problem, they are instructed to contact the City Engineer, who will make a site visit and confer with the contractor to determine the problem and effectively eliminate it or stop orders are issued.

Rationale: The City’s Storm Water Stakeholders Committee has evaluated the need for a detailed section to be added to the City’s Stormwater Design Manual (a copy is attached). This detailed section shall include a program to reduce pollutants in any stormwater runoff to the small MS4 from construction activities that result in a land disturbance of greater than or equal to one acre. Any construction site less than one acre shall be included in the program if the construction activity is a part of a larger common plan of development or sale that would disturb one acre or more. In the next five years, the program plans to create an ordinance to require erosion and sediment controls, as well as sanctions to ensure compliance, to the extent allowable under State or local law. This includes the statewide NPDES General Stormwater Permit for Construction Activities. There will requirements for construction site operators to:

- Implement appropriate erosion and sediment controls
- Obtain permitting, even if constructing a residential neighborhood.
- Control waste such as discarded building materials, concrete truck washout’s, chemicals, litter, and sanitary waste



- Procedures for site review, and plan review (which plans are considered for site review and which ones aren't)
- Procedures for receipt and consideration of information submitted by the public
- Identify which sites are more important than other and why
- Procedures for site inspection and enforcement of control measures, and detail exactly what sanctions will be applied for noncompliance for example fines or stop-work orders

The construction site stormwater control program shall include pre-construction site plan reviews (reviews of construction site Stormwater Pollution Prevention Program) of 100% of projects from construction activities that result in a land disturbance of greater than or equal to one acre. These applicable sites shall have the SWPPP evaluated and approved through ADEQ and they will be inspected at least once a month to ensure compliance.

The new annual report shall document:

- Number of applicable sites in the MS4's jurisdiction
- Number of pre-construction site plan review performed
- Number and frequency of site inspections
- Number of violation letters issued
- Number of enforcement actions taken
- Number of complaints received and the number that was followed up on

The City's Building Inspector shall possess a Storm Water Certification issued through an Arkansas approved program. City Building Inspectors are to visit the construction site form beginning to end of project one time per week and are to fill out the Stormwater Construction Site Inspection Report attached.

The City's measurable goal will require 100% participation on all construction sites through the permitting and inspection process. Code Enforcement, Utility Administration, the Planning Commission, the Design Review Commission, the Fire Department, and the City Engineer are all involved in the management and implementation of the construction site stormwater control program with the City Engineer being the overall coordinator.



5. Post-Construction Stormwater Management in New Development and Redevelopment

Decision Process: The City's Storm Water Stakeholder's Committee evaluated the need to reevaluate how the city goes about permitting and inspecting any grading, drainage, erosion control, hazardous and illicit discharges, and has recommended that an ordinance be written to address the City's issues within the next 5 years.

Rationale: The City will enforce a program to address stormwater runoff from new development and redevelopment projects that disturb greater than or equal to one acre, including projects less than one acre that are part of a larger common plan of development or sale, that discharge into small MS4. The program shall ensure that controls are in place that will prevent or minimize water quality impacts;

The goal of having a Post-Construction Stormwater Management Plan is to restore any property that was affected by construction to be able to go back to its preconstruction condition and minimize surface pollutants. This is addressed in the ordinance attached. This ordinance will help in maintaining wetlands, riparian areas, open space, buffers along sensitive water boundaries, education for developers and the public about project designs that minimize water quality impacts.

Each permittee shall ensure the long-term operation and maintenance (O&M) of each Best Management Practice, which will include any wet ponds, detention ponds, filtration (grass swales), bio-retention cells, sand filters and infiltration basins or trenches. This agreement shall extend past construction phase to contractors, and then on to any other parties that are involved in post-development landownership. Annual reporting should begin as each new development is complete and following up on Operation and Maintenance Practices to ensure pollution is kept to prior undisturbed conditions.

Planning and Development zoning ordinances, along with the Planning Commission ensure any construction is kept at low impact development, meaning they encourage green infrastructure, and minimizing dust zones by providing hard surfaces. Attached is the City of West Memphis' Zoning Ordinance.



Management and implementation of the postconstruction Best Management Practices for the Storm Water Management Plan shall include:

- City Engineer: Preconstruction plan review, Construction Inspection and Post construction Inspections, Public Outreach, Post-Construction Stormwater Management, Performance Standardization, Annual Reporting, Pollution Prevention/Good Housekeeping for Municipal Operations
- Building Inspectors: Construction Inspection
- Floodplain Administrator/Public Works Assistant & Communications Director: Public Outreach and Education, Pollution Preventions, Any Material for Public Viewing
- Planning & Development Director: Low Impact Development

6. TMDL's and BMP's for Improvement

1. Identifying Targeted Controls:
 - Sanitary Sewer Systems
 - On-Site Sewage Facilities (for entities with appropriate jurisdiction)
 - Illicit Discharges and Dumping
 - Animal Services
 - Residential Education
2. Areas of Emphasis:
 - Sanitary Sewer Systems
 - Reduce Sanitary Sewer Overflows
 - Address Sanitary Lift Station Inadequacies
 - Improve Reporting of Sanitary Sewer Overflows
 - Reduce FOG (Fats, Oils, and Grease) Blockages
 - On-Site Sewage Facilities
 - Identify/Address Failing Systems
 - Address Inadequate maintenance OSSFs
 - Illicit Discharges and Dumping
 - Reduce Waste Sources of Bacteria (e.g. septic systems, grease and grit traps)
 - Do weekly monitoring of all stormwater apprentices
 - Animal Sources



- Identify and target animal sources (e.g. zoos, pet waste, and horse stables)
 - Residential Education
 - Bacterial Discharges from Residential Sites
 - Fats, Oils, and Grease clogs in lines and overflows
 - Decorative Ponds
 - Pet Waste
3. Education Target
- Sanitary Sewer Systems
 - Operational and Maintenance Staff and Policy Makers
 - On-Site Sewage Facilities
 - OSSF owners and regulators
 - Illicit Discharges and Dumping
 - Operations and Maintenance Staff, Stormwater Staff, system owners, etc...
 - Animal Services
 - Code Enforcement and Zoning Staff, Changing Policy
 - Residential Education
 - Residents and Potential Visitors
4. Schedule of Implementation
- Sanitary Sewer Systems
 - Initiated in 2017, Anticipate Primary Activities Completed by 2030.
 - On-Site Sewage Facilities
 - Initiated in 2017, Anticipate Primary Activities Completed by 2030.
 - Illicit Discharges and Dumping
 - Initiated in 2017, Anticipate Primary Activities Completed by 2030.
 - Animal Services
 - Initiated in 2017, Anticipate Primary Activities Completed by 2030.
 - Residential Education
 - Initiated in 2017, Anticipate Primary Activities Completed by 2030.
5. Interim, Measurable Milestones
- Sanitary Sewer Systems
 - Annual Reporting required on sub goals and progress towards full implementation.
 - On-Site Sewage Facilities



- Annual Reporting required on sub goals and progress towards full implementation.
 - Illicit Discharges and Dumping
 - Annual Reporting required on sub goals and progress towards full implementation.
 - Animal Services
 - Annual Reporting required on sub goals and progress towards full implementation.
 - Residential Education
 - Annual Reporting required on sub goals and progress towards full implementation.
6. Progress Indicators
- Sanitary Sewer Systems
 - Accomplishment of sub goals and targeted reductions.
 - On-Site Sewage Facilities
 - Accomplishment of sub goals and targeted reductions.
 - Illicit Discharges and Dumping
 - Accomplishment of sub goals and targeted reductions.
 - Animal Services
 - Accomplishment of sub goals and targeted reductions.
 - Residential Education
 - Accomplishment of sub goals and targeted reductions.
7. Monitoring Component
- ADEQ-approved QAPP routine water quality monitoring. Other sources of data including COA, the CRWN, and other affiliated citizen monitoring efforts.
8. Responsible Organizations
- Small MS4s (as applicable) vial submitted SWMP.



7. Pollution Prevention/Good Housekeeping for Municipal Operations

The City of West Memphis will implement an operation and maintenance program that includes staff training on a regular basis with the goal of preventing or reducing pollutant runoff from municipal operations. These maintenance procedures include open space maintenance, fleet and building maintenance, new construction and land disturbances, and stormwater system maintenance.

Municipal operations such as drainage and flooding are directly impacted by following the 5-year plans of the MS4. This will reduce floatables in the major drainage outfall, the Ten Mile Bayou. Also, site cleanup around municipal buildings, where aggregates are stored in bulk need to be kept away from becoming a pollution source when wind or rain carry them from the intended storage. Site clean-up also means not storing tires in a manner unintended that could potentially breed mosquitoes (see future city ordinance attached). All working mechanical shops must include clean floor drains, proper disposal of oils and lubricants and a well-ventilated area for working. Any type of car wash assembly will be required to be connected directly into the sewage system, with a sand trap and an oil & water separator. All equipment must be stored to the manufacturer's specifications and no equipment shall be leaking. The city plans on incorporating these discussions in their annual safety awareness week to meet the MS4's standards.

This O&M will also list of industrial facilities operated by the MS4 that are subject to ADEQ's Industrial Stormwater General Permit and owned by the City of West Memphis. After an audit by ADEQ in April of 2019, the City Engineer was made aware that two facilities owned by the City of West Memphis needed Industrial Stormwater Permits and these include:

The City Shop
511 E. Jackson
West Memphis, AR 72301

West Memphis Utility Main Campus
604 E. Cooper
West Memphis, AR 72301



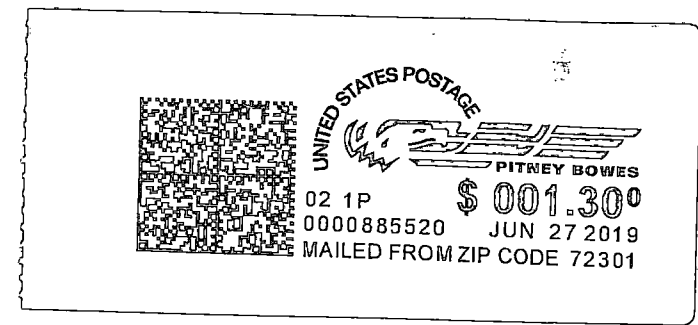
- City Engineer: Preconstruction plan review, Construction Inspection and Post construction Inspections, Public Outreach, Post-Construction Stormwater Management, Performance Standardization, Annual Reporting, Pollution Prevention/Good Housekeeping for Municipal Operations
- Building Inspectors: Construction Inspection
- Floodplain Administrator/Public Works Assistant & Communications Director: Public Outreach and Education, Pollution Preventions, Any Material for Public Viewing
- Planning & Development Director: Low Impact Development

The City will begin reporting annually to ADEQ for each year of the Industrial Stormwater Permit. The first report will be due fifteen months from the effective date of the permit, covering the activities of the permittee during the twelve-month period beginning on the effective date of the permit for the permittee. Subsequent annual reports are due on the same date for each of the following years during the remainder of the permit term (and continuing into any administrative continuance of the permit, should it not be reissued prior to expiration). Prior to submitting annual reports to ADEQ, MS4s shall include a copy of the annual report in electronic format on their websites and at local centers of information (i.e. 2014 report would be due no later than June 1, 2015). Annual reports will be publicly available on ADEQ's website. The report will include:

- Status of compliance-BMPs, progress towards control measures;
- Data that was collected and analyzed (discharge pollutants)
- Summary of stormwater activities the permittee undertakes between reporting cycles
- Any changes to the stormwater management program
- Schedule of implementation
- Notice if permittee is relying on another governmental aid for permit obligations
- Submit to appropriate ADEQ forms:

ADEQ
Water Division, General Permits
5301 Northshore Drive
North Little Rock, AR 72118

City of West Memphis
Amanda Hicks
205 S. Redding
West Memphis, AR
72301



ADEQ - office of Water Quality
Terry Liu, P.E.
5301 Northshire Drive
North Little Rock, AR
72118-5317

